TSD File Inventory Index

Date November 17, 2009

Initial CM Renero

Facility Name	Big River Zinc Corporation
Facility Identification Number	ILD 062 447 435

A.1 General Correspondence		B.2 Permit Docket (B.1.2)	
A.2 Part A / Interim Status A.2	1	1 Correspondence	
1 Correspondence		2 All Other Permitting Documents (Not Part of the ARA)	
2 Notification and Acknowledgment	1	C.1 Compliance - (Inspection Reports)	
3 Part A Application and Amendments		C.2 Compliance/Enforcement C.2 (2)	2
4 Financial Insurance (Sudden, Non Sudden)		1 Land Disposal Restriction Notifications	
5 Change Unde Interim Status Requests		2 Import/Export Notifications	
6 Annual and Biennial Reports		C.3 FOIA Exemptions - Non-Releasable Documents C.3	1
A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment	
1 Correspondence		1 RFA Correspondence	
2 Reports		2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure		3 State Prelim Investigation Memos	
1 Correspondence		4 RFA Repons	
2 Closure/Post Closure Plans Certificates etc		D. 2 Corrective Action/Facility Investigation	
A.5 Ambient Air Monitoring		1 RFI Correspondence	
1 Correspondence		2 RFI Workplan	
2 Reports		3 RFI Program Reports and Oversight	
B 1 Administrative Record		4 RFI Draft /Final Repon	

Total - 5

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6 RFI QAPP Correspondence		8 Progress Reports	
7 Lab Data Soil-Sampling/Grounowater		D.5 Corrective Action/Enforcement	
8 RFI Progress Reports		1 Administrative Record 3008(h) Order	
9 Interim Measures Correspondence		2 Other Non-AR Documents	
10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
D.3 Corrective Action/Remediation Study		1 Forms/Checklists	
1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
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4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		G.1 Risk Assessment	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
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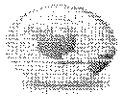
.2 CMI Workplan		5 Permitting	
3 CMI Program Reports and Oversight		6 Corrective Action Remediation Study	
4 CMI Draft/Final Reports		7 Corrective Action/Remediation Implementation	
5 CMI QAPP		8 Endangered Species Act	
6 CMI Correspondence		9 Environmental Justice	

Note Transmittal Letter to Be Included with Reports

Comments



ContingencyPlan rev aug 4 2009
Mike Altepeter to: Todd Brown 08/04/2009 03:01 PM

From: "Mike Altepeter" <maltepeter@bigriverzinc.com>
To: Todd Brown/R5/USEPA/US@EPA

Todd,
I have incorporated the changes. Please see page 6,7. It takes longer to try and
send just the pages so I am sending the whole dolument.
Mike

RCRA CONTINGENCY PLAN
AND EMERGENCY RESPONSE PROCEDURES

BIG RIVER ZINC CORPORATION
SAUGET, ILLINOIS

Revised August 4, 2009

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APPENDICES

1.0 INTRODUCTION

This RCRA Contingency Plan and associated Emergency Response Procedures (ERP) have been prepared for the Big River Zinc Corporation (BRZ) facility in Sauget, Illinois, in compliance with the requirements outlined in the U.S. Environmental Protection Agency (USEPA) rules and regulations for the Resource Conservation and Recovery Act (RCRA) - Hazardous Waste 40 CFR Part 264. Specifically, this document contains the requirements set forth by RCRA regarding a facility's Contingency Plan and Emergency Procedures for the accidental release of hazardous waste (40 CFR Part 264, Subpart D).

This Plan will be updated if the plan fails in an emergency, the facility changes in a way that increases the potential for fires, explosions, or releases of hazardous waste, or there is a change in the emergency coordinators or emergency equipment lists.

2.0 DESCRIPTION OF FACILITY

Big River Zinc Corporation (BRZ), Sauget, Illinois is engaged in the production of zinc. Sulfuric acid, copper cake, lead/silver concentrate, copper precipitate, and cadmium oxide are sold as by-products. The manufacturing process begins with fluid bed roasting of zinc sulfide concentrates. Sulfur dioxide is produced during the roasting process and is used to create sulfuric acid. The impure zinc oxide from the roaster is treated in several stages with sulfuric acid to leach out metals such as zinc, copper, cobalt, and cadmium. These metals are recovered and are sold as by-products to other industries, as is the lead and silver contained in the insoluble lead concentrate recovered from the leaching steps. The zinc goes through several additional steps and is recovered from solution by an electrowinning process. The sheets are washed and fed into an electric- induction-melting furnace. The zinc is then poured into a mold, cooled, and shipped to the customers.

The facility is located at Route 3 and Monsanto Ave., Sauget, Illinois (Figure 1). The facility has three production shifts. Facility personnel are on site 24 hours per day, 7 days per week. The facility property is oriented on a north-south axis and comprises 35.4 acres with approximately 60% of the property under roof or paved.

BRZ has one hazardous waste roll-off container, which is located west of the cadmium building. Filters containing metals are disposed of in the roll-off container. The roll-off is emptied at least every 90 days.

3.0. EMERGENCY REPORTING PROCEDURES

At all times, there is at least one employee at the facility or individuals who can be contacted with the responsibility for coordinating all internal emergency response measures at the facility. As required by federal regulations, the Emergency Coordinator (EC), or his alternate, is thoroughly familiar with all aspects of the ERP, all operations and activities at the facility, and the location of appropriate facility records. The EC and alternates may be reached through the security department.

3.1 Implementation of the Emergency Response Plan

The primary or the alternate Emergency Coordinators will decide which portions of this ERP are to be implemented following an evaluation of the site conditions. The basis of the EC's decision is his assessment of the magnitude of the emergency. The EC will determine if the emergency presents an actual or possible threat to human health and the environment, or if Big River Zinc personnel can control the situation.

Some types of emergencies that require full implementation of the ERP include:

- A fire that could spread off site;
- A fire that is too large to extinguish with a portable fire extinguisher;
- A spill or release of hazardous material that results in airborne constituents; and
- Uncontainable runoff due to a large fire, spill or release of material.

3.2 Internal Notification Procedures

<u>Personnel</u>

Upon discovering a situation that may represent an emergency, plant personnel will:

a. Report the situation to a supervisor immediately or call security if the supervisor cannot be found immediately; and

b. Verbally warn other personnel if the situation is an immediate threat to their safety.

<u>Supervisor/Security</u>

When notified of an emergency situation, the supervisor/security will:

a. Take necessary steps to prevent injury to personnel, damage to equipment, and any potential fire hazard; and

b. Contact the Emergency Coordinator or alternate.

Emergency Coordinator

The primary EC (or an alternate) will follow the procedures below in the event of a release, explosion, fire, or other emergency:

- Assess the situation and if warranted:

  Declare an emergency and notify all plant personnel with instructions by two-way radios. If there is a release, fire, or explosion that could threaten human health or environment outside the facility, the EC is to immediately declare an emergency.

  Notify security to call for police and/or fire department. The police or fire departments have the responsibility for coordinating outside response efforts. Telephone numbers of emergency response agencies are located in Section 3.3. A two-way radio connection is also available in the security office for contacting the police and fire departments.

- Commit and direct activities of any and all resources available that are necessary to carry out the ERP. The EC will focus on measures to eliminate potential harm to human health and the environment.

Whenever there is a release, fire, or explosion, the EC will act without delay to identify the character, exact source, amount, and aerial extent of the released materials. This may be accomplished by observation or review of facility records, manifests, and, if necessary, by chemical analysis. The EC will inspect for possible hazards to human health or the environment, both direct and indirect. This assessment will consider onsite and offsite effects as required.

Throughout the emergency, the EC will take measures, which are reasonable and necessary to ensure that fires and/or releases do not have an effect on any other substances at the facility.

3.3 Emergency Contact Phone List

Security	Ext. 110 (Internal Plant Phone) (618) 274-5000 ext. 110 (Outside Phone) Plant Radio
Primary Emergency Coordinator	
Mike Altepeter	(618) 274-5000 Ext.194 (office) (314) 846-8093 (Home) (618) 410-8021 (cell)
Home Address	2936 Point Drive St. Louis, MO 63129
Alternate Emergency Coordinator	
Anthony Thomas	(618) 274-5000 Ext. 198 (office) (618) 410-8020 (cell)
Second Alternate Emergency Coordinator	
Tom Gallagher	(618) 274 5000 ext 262 (office) (618) 444 5274 (cell)
Home Address	73 Edgewood drive Sullivan, MO 63080

Federal	National Response Center (Release of Hazardous Substances)	(800) 424-8802
	USEPA Region V	(312) 353-2000
State	Illinois Emergency Management Agency	(800) 782-7860

Local Emergency Response: Sauget Police, Fire, Ambulance 911

Local Emergency Planning Committee (LEPC) (618) 277-3012

Mr. Don Feher
Local Emergency Planning Committee
321 W. "F" Street
Belleville IL 62220-1193

Hospital

Memorial Hospital Emergency (618) 257-5840
Attn. Mr. Don Schneider
4500 Memorial Drive
Belleville, IL 62226

Contractor Support

Heritage Environmental (800) 388-3500
Attn: Mr. Dan Hans
1188 Pershall Road
Bellfountaine, MO 63137

Onyx Industrial Services (618) 931 0010
Fred Davidson
121 East Chain of Rocks Road
Mitchell, IL 62040

Bellon Environmental Company (314) 890 8600
Bob Goodman
600 Fairview
St. Louis, MO 63132

A copy of the plan and updates to the plan will be sent to the Sauget Fire and Police Departments, the LEPC, Memorial Hospital and the contractors mentioned by registered mail return receipt requested. The return receipts will be filed. A representative of each will be contacted by telephone and the outcome of the conversions recorded and kept on file.

The discussions with the emergency departments will include:

1) Arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility and possible evacuation routes;

2) Where more than one police and fire department might respond to an emergency, agreements designating primary emergency authority to a specific police and a specific fire department and agreements with any others to provide support to the primary emergency authority;

3) Agreements with State emergency response teams, emergency response contractors, and equipment suppliers; and

4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses that could result from fires, explosions, or releases at the facility.

b) Where State or local authorities decline to enter into such arrangements, the Big River Zinc will document the refusal in the Contingency plan emergency contacts record.

3.4 Evacuation Plan

The EC will assist the fire department in determining the need for evacuation of the area surrounding the plant. This assessment is based on the EC's knowledge of the hazardous materials involved, the site conditions, and the current weather conditions. The role of the EC in this situation is an advisory one, and the decision to evacuate an area is the responsibility of the appropriate agencies.

The EC and alternates are responsible for the plant-wide evacuations only. Designated evacuation routes for plant personnel are displayed on Figure 2. Communication of evacuation to employees is by two-way radios, alarms, intercom, and other personnel to insure that all employees are informed and evacuated. The fire alarms are tested monthly to ensure they are in proper working condition. If an evacuation is ordered, plant personnel shall discontinue operation of all equipment and evacuate the area as soon as possible. Evacuation routes are determined according to the plant area affected.

Upon receiving instruction by two-way radio or by activation of an audible warning device, supervisors are to instruct employees to leave the facility according to their predetermined exit routes. The employees are to go to the designated assembly point, west of the facility, in the employee parking lot. Once the plant is evacuated, the supervisor of each area takes a prompt and accurate account of all personnel to ensure that everyone is accounted for.

The fire department is responsible for evacuation plans within the surrounding area and for coordinating local resources, including the police department and hospitals to assist in the implementation of the evacuation plan.

The EC, in consultation with the fire department and other local agencies, as necessary, will decide when reoccupation of the facility is possible. Only after following all the post-emergency procedures (see Section 5.0) can the facility resume operation.

3.5 Emergency Response Procedures

3.5.1 Fire and Explosion Emergency Response

An employee, upon detecting a fire or imminent explosion in the facility, will initiate the following actions:

- Use hand-held fire extinguishers to control or extinguish the fire if the fire is in an initial, controllable stage and no potential for imminent explosion exists.
- Contact his supervisor or security. Security will locate the EC and inform him of the fire and its location. Activate the alarm system. The supervisor will begin response preparation.
- Upon receiving available information, the EC or security will call the fire department to inform them of the situation and receive instruction.

After following the steps outlined above for emergency situations, the EC or, in his absence, the supervisor, must do the following:

- Take action to shut off electrical power and any gas in the vicinity of the fire location. Stop process and/or operations that may interfere with the emergency response actions;
- Take action, if necessary and safe to do so, to place absorbent materials around drains to prevent spilled hazardous waste from entering the sewer system;
- Notify all unauthorized personnel to vacate the area per evacuation plans; and
- Follow any instruction given by the fire department.

In addition, the EC must also:

- Note the current weather conditions and estimate the current wind direction and speed;
- Identify the character, source, amount, and aerial extent of any released hazardous materials by observation and review of facility records, manifests, and, if necessary, by chemical analysis; and
- Determine if the situation necessitates complete evacuation of the plant site. Furthermore, the EC will assist the Fire Department in their decision to evacuate the surrounding area.

If the situation meets the criteria for full implementation, at the first opportunity, the EC shall report the emergency to the National Response Center **(800-424-8802)** and the Illinois Emergency Management Agency **(800-782-7860)**. This verbal report includes:

- Name, address, and telephone number of the reporter;
- Name and address of the facility;

- Time and type of incident;
- Name and reportable quantity of material involved to the extent known;
- Extent of injuries, if any; and
- Possible hazards offsite to human health and the environment.

3.5.2 Spill Emergency Response

Any employee discovering a hazardous waste spill is to immediately notify his supervisor or security. Security will notify the EC or alternate. The EC will assess the situation and act as follows:

- Clear the area of unauthorized personnel. Stop process and/or operations that may interfere with the emergency response;
- Identify the source or cause of the release material and obtain a Material Safety Data Sheet(s) (MSDS). Use MSDS information to guide response and determine personal protective equipment (PPE) required;
- Direct trained personnel to don the appropriate PPE, as used in normal job duties, and re-containerize the spilled material;
- Alert local authorities if material may reach outside facility property;
- Rope off and/or barricade the area to prevent entry of unauthorized personnel;
- Take measures to contain the spill;
- Direct cleanup so that all hazardous materials are placed in properly labeled containers;
- Ensure that spill material, water, and adsorbents are placed in Department of Transportation (DOT) approved containers for ultimate disposal; and
- Insure that no incompatible wastes are stored within the spill area until cleanup is complete.

4.0 RELEASE REPORTING REQUIREMENTS

4.1 General

In the event of external release of a hazardous material, the procedures outlined in Section 3.0 will be followed. Prior to contacting state and local agencies, the EC will gather as much information about the incident as quickly as possible. The concerned agencies will then be contacted with initial information. The appropriate agencies will be kept informed of any new, additional, or changed information regarding the incident.

4.2 Release of RCRA Hazardous Waste

In case of a fire, explosion, or release of hazardous waste (equal to or greater than the reportable quantity for the material), as defined under RCRA (40 CFR, Section 261) which could threaten human health or the environment outside the facility, concerned agencies will be contacted as soon as possible by the EC. If the evacuation of surrounding areas may be required, local emergency response teams will be alerted. The following agencies will be contacted by the EC:

Federal	National Response Center	(800) 424-8802
	USEPA Region V	(312) 353-2000
State	Illinois Emergency Management Agency	(800) 782-7860
Local	Sauget Fire, Police, Ambulance	911
	Mr. Don Feher Local Emergency Planning Committee (LEPC) 321 W. "F" Street Belleville, IL 62220-1193	(618) 277-3012

Contractor Support:

Heritage Environmental Attn. Mr. Dan Hans 1188 Pershall Road Bellfountaine, MO 63137	(800) 377-2440

Or

Onyx Industrial Services Fred Davidson 121 East Chain-of- Rocks Road Mitchell, IL 62040	(618) 931 0010

Bellon Environmental Company (314) 890 8600
Bob Goodman
600 Fairview
St. Louis, MO 63132

5.0 POST-EMERGENCY PROCEDURES

When the emergency is contained, and a threat to human health and the environment no longer exists, the EC will take the following post-emergency actions:

- Decontamination/cleanup;
- Waste management;
- Post-emergency reporting; and
- Post-emergency assessment.

5.1 Decontamination/Cleanup

All of the equipment used in the emergency response procedures will be either decontaminated or properly containerized for disposal. Any non-emergency response equipment, such as materials or machinery, also affected by the emergency response will be decontaminated or disposed. The EC is responsible for arranging immediate replacement of any spent emergency response materials.

5.2 Waste Management

Waste residual materials, along with emergency response equipment needing disposal, will be collected and containerized in accordance with applicable regulations governing the management of such materials. Once all hazardous material is properly containerized, storage and disposal will be conducted according to applicable regulations.

5.3 Post-Emergency Reporting

The EC is responsible for ensuring the preparation and submittal of all required reports. A release, fire or explosion requires a written report to the USEPA Region V within 15 days of the event and the IEPA upon request only. The report will include:

- Name, address, and telephone number of the facility;
- USEPA identification number for the site;

- Date, time, and type of incident (e.g., fire, spill, etc.);
- Name and quantity of material(s) involved;
- Extent of injuries, if any;
- Assessment of any actual or potential hazards to human health or the environment;
- Procedures followed to reduce and remove released materials;
- Estimated quantity and disposition of the recovered material that resulted from the incident;
- Corrective measures taken;
- Whether an evacuation was required; and
- Name of individuals who have also been contacted or notified.

5.4 Post-Emergency Assessment

After the emergency episode, the EC will determine the causes of the emergency and analyze the effectiveness of emergency response procedures. The ERP will be modified if it is determined that procedures are inadequate or ineffective. If equipment capabilities are found unacceptable, necessary improvements will be made.

6.0 EMERGENCY EQUIPMENT

6.1 Communication Systems

Four different communication systems are available in the case of an emergency. They are described below.

Type	Description	Inspection Required
Two-Way Radios	The base station for the two-way radios is located in the main Security Office at the main gatehouse. Six two-way radios are located in the security department. Each of the four departments has a minimum of two radios that are normally carried by the supervisors. Many of the operators also have two-way radios. Fourteen radios are assigned to maintenance supervisors and the "rotating shift" electrician and mechanic. Two-way radio communications with the police and fire departments of Sauget is available to security. A weather monitor is available 24-hours per day in case of a weather emergency.	Radios are in use daily so any problems with the system or individual radios would be detected immediately.
Telephones	There are three lines into the Security Office. Telephones are located in all supervisors offices, all control rooms, all administrative offices, and in various maintenance areas. Inner plant phones do not have access to outside lines so security must be called in case of emergency.	Telephones are in use daily so any problems would be detected immediately.
Cell Phones	There are 19 Cell Phones issued to Key company management personnel. These can be used to contact people needed while outside or inside the plant. The cell phones can be used as normal phone or "walkie talkie" mode.	The cell phones are in use daily so any problems would be detected immediately.
Message Center Operations	A continuing liaison can be maintained through the Security Office for needed information by using the telephone communications. However, emergency communications would generally be handled through the two-way radios and Cell Phones for faster response time.	N/A

6.2 Fire Equipment

Fire response equipment is located throughout the facility. This includes sprinkler systems, hand held fire extinguishers, and fire equipment boxes.

A smoke detection system is located in the computer room on the bottom floor of the administrative building and in the Safety Office. These systems sound in the main security office when activated. Five automatic deluge sprinkler systems are located throughout the plant. These systems and the twelve fire hydrants are supplied with water under pressure through the fire protection pump. An alarm siren and warning light are located on the outside of the building to alert personnel that the system is in use. The sprinkler systems are checked once a month by the maintenance department.

A list of the location and contents of the hand held fire extinguishers is located in Table 1 of Appendix B. The department supervisors inspect the extinguishers on a weekly basis. Documented inspections of the fire extinguishers are located in the safety department. In other areas, a designated person inspects the extinguishers on a monthly basis. Fire extinguisher training is held annually for all employees. No employees are trained when hired.

There are seven fire equipment boxes located throughout the facility. A list of these locations and contents of the boxes are provided in Table 2 of Appendix B. The boxes are inspected on a monthly basis by the security department.

6.3 Personnel Protective Equipment

In case of a release, fire, or explosion, goggles, face shields, respiratory protection, full body acid suits, and barrier cream are available from the Safety Department. Rubber dielectric boots, heavy-duty rubber gloves, neoprene gloves, vinyl and latex gloves, and Tyvek disposable clothing are available from the storeroom.

6.4 First Aid

Stretchers are available in the foreman's office of every department. Safety showers are located at various locations in each department. Stokes basket and confined space rescue equipment are stored in the respirator room.

6.5 Spill Response Kits

Spill response kits containing appropriate tools and sorbent materials are located throughout the facility. A list of the spill kits and their locations are presented in Table 3 of Appendix B.

7.0 Training

Copies of all training documents will be kept in the Environmental manager's files and in Safety dept files, and on the Server. Please refer to the RCRA training document for a detailed description on training. As a minimum the program will document:

a. The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job.
b. A written job description for each position described above.
c. A written description of the type and amount (RCRA Training Document) of both introductory and continuing training that will be given to each person described above.
d. Training records detailing training given will be kept for at least three years from the date the employee last worked for the company.

APPENDIX A

FACILITY SITE DIAGRAMS

APPENDIX B

EQUIPMENT TABLES

Table 1
Location and Content of Fire Equipment Boxes
Big River Zinc Corporation
Sauget, Illinois

Box Number	Location
A	South of main Casting Dept. - East of the South Contracting Gate
B	South of the Vehicle Shop along the West fence line
C	East of Cell room along East fence line
D	East of Leach/Purification along East fence line
E	East of the Specialty Casting Building - West of Cell room Unit #3
F	At the Oil House
G	Northwest of the Acid Plant Converter, by the railroad tracks

Contents of Fire Equipment Boxes

QUANTITY	ITEM	DESCRIPTION	USE/CAPABILITIES
One	1 1/2 in. Nozzle	Brass nozzle, Combination, Adjusts to fog or straight stream	Enable user to adjust stream of water for the need at the time of a fire.
One	Reducer	Threaded reducer 2.5" by 1.5"	To connect hydrant outlet to the smaller fire hose
Two	Universal Spanner Wrenches	Cast aluminum 'C' shaped wrench.	Use to tighten reducer to hydrant and to connect fire hoses.
One	Hydrant Wrench	Adjustable combination hydrant and spanner wrench	Used to open the hydrant by turning the top post.
Three	Fire Hoses	50 foot sections of 1 1/2 in. industrial strength fire hose	Use to make hose capable of reaching a fire.
One	Axe	Wood handle fireman axe	Use to break open items so water can reach fire.

Table 2
Spill Response Kit Locations and Contents
Big River Zinc Corporation
Sauget, Illinois

Spill Kit #	Name of SPCC Area	Location Description	Contents Code
1	Drum Storage Area # 2	Roaster Mechanics area outside the south outer wall	1
2	#5 Substation-pad mounted transformer	Inside doorway, SE corner of skimmings plant	1
3	Waste Oil # 2	Outside the NW corner of the oil house	1
4	Diesel & Gasoline dispensing area	Above ground tanks, located west of RR tracks and S of cafeteria	1
5	Waste Oil # 1	Outside of building at the SW corner of the vehicle shop	1
6	Substation # 13A & 13B Pad mounted transformer	Substation located N of special casting & S of the purified storage tanks	1
7	# 4 Substation transformer	Inside E wall of the special casting bldg. N of the T-metal furnace	1
8	Substation # 6, 6A & 6B, Pad mounted transformer	S end of the main casting bldg. Inside the fenced area of the transformer yard	1
9	Substation # 11, Pad mounted transformer	S of cell room unit # 3	1
10	Satellite Kerosene storage tank (winter only)	Outside SE corner of the Quonset storage	1
11	Substation # 1, Pad mounted transformer	Fenced transformer area, south end of cell room	1
12	Substation # 2, Pad mounted transformer	SE corner of fenced transformer yard, S end of cell room	1
13	Substation # 9, Pad mounted transformer	E side of ground level L/P, south of residue loading	1
14	Hazardous waste storage	Satellite stations for oil dry in vehicle shop and oil shed. Satellite station for parts washer in Vehicle shop	2

Contents Code 1	**Contents**	**Use/capabilities**
	6 ea. 3' x 10' adsorbent socks	Used to contain hazardous flowing material absorb it and preventing the contaminant from reaching sewer or groundwater.
	4 ea. Adsorbent Pillows	Used to directly absorb flowing contaminant
	75 ea. Absorbent mats	Used to directly absorb flowing contaminant and wipe down equipment
	10 ea. bags and ties	Used to contain used socks pillows, mats, and other contaminated material and transfer to Waste containers.

Contents Code 2	**Contents**	**Use/capabilities**
	Shovel	Pick up spilled solid waste and return to container
	Push Broom	Push waste into pile for removal with shovel
	Fire extinguisher	Extinguish fire
	Absorbent material	To place on dusty waste to keep it from becoming airborne and facilitate returning to container

RE: Contingency plan for Big River Zinc

Mike Altepeter to: Todd Brown 08/04/2009 02:26 PM

From: "Mike Altepeter" <maltepeter@bigriverzinc.com>
To: Todd Brown/R5/USEPA/US@EPA

Todd,
The contingency plan was revised on 13 May of this year because one of the alternate emergency coordinators accepted another position (in Yemen). The name
and address of the new alternate was put into the plan. The revised plan I last
sent you was mailed to the Police, Fire Dept, LEPC and the Hospital by registered mail and I called the Sauget Fire department, Police department and Memorial Hospital. The Fire and Police were had no problems with the plan but the Hospital never returned my messages. The changes concerning contacting these
agencies are in the revised plan on page 6 under the emergency contacts. It is highlighted in grey. If the change is ok, I will send copies of the revision to
all and contact by phone. All this will be kept on file.
In 2009 we have not disposed of any hazardous waste. We only have the satellite
drums for collection of used oil dry and a drum for parts washing. Two drums have not been used and the other two have very little in them because we have little activity at the plant.
Mike

-----Original Message-----
From: Brown.Todd@epamail.epa.gov [mailto:Brown.Todd@epamail.epa.gov]
Sent: Tuesday, August 04, 2009 1:02 PM
To: Mike Altepeter
Subject: Re: Contingency plan for Big River Zinc

Dear Mr. Altepeter:

My apologies for taking several days to reply. I have been out of the office.

Below is the issue with Big River Zinc's current contingency plan that I believe still requires correction. If this can be corrected prior to EPA filing the Consent Agreement and Final Order, EPA can remove this issue from the Order. However, we would like it to be corrected in the next couple of days if possible, as we need to file this Order shortly. Alternatively, we can agree to leave this requirement in the Order, and you can fix it after the Order is filed, in accordance with the schedule of the Order (i believe the draft Order currently requires this to be corrected with 2 weeks or so of the filing of the order).

Current Contingency Plan Issue

35 IAC 722.134(a)(4) and 725.137 requires that hazardous waste generators attempt to make arrangements with certain emergency response organizations (e.g., police, fire department, hospitals, etc.), as appropriate for the type of waste handled at the facility and the potential need for the services of those organizations. If these emergency response organizations decline to enter into the arrangements,

then the generator must document the refusal. 35 IAC 725.152(c) r equires that these arrangements be described in your contingency plan.

I have pasted the required arrangements, as spelled out in the regulations, below for your convenience. I do not see where these arrangements are currently described in your contingency plan. If you believe they are, please call me and help me understand what I am missing. I would be happy to discuss. Otherwise, EPA simply needs Big River Zinc to include a description of the arraignments that have been made in its contingency plan (or make the arrangements if they have not already been made).

If you make the corrections, please forward the corrected plan, or pages of the plan, to me via e-mail or fax. My fax is 312-692-2573.

Thank you in advance for your cooperation in this matter.

Sincerely,

Todd C. Brown
U.S. EPA - Region 5
Land & Chemicals Division
RCRA Branch
(312) 886-6091
brown.todd@epa.gov

Section 725.137 Arrangements with Local Authorities

a) The owner or operator must attempt to make the following arrangements, as appropriate for the type of waste handled at his facility and the potential need for the services of the following organizations:

1) Arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility and possible evacuation routes;

2) Where more than one police and fire department might respond to an emergency, agreements designating primary emergency authority to a specific police and a specific fire department and agreements with any others to provide support to the primary emergency authority;

3) Agreements with State emergency response teams, emergency response contractors, and equipment suppliers; and

4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses that could result from fires, explosions, or releases at the facility.

b) Where State or local authorities decline to enter into such arrangements, the owner or operator must document the refusal in the operating record.

"Mike Altepeter"
<maltepeter@bigr

iverzinc.com>

07/30/2009 02:05 PM

To Todd Brown/R5/USEPA/US@EPA

cc

Subject Contingency plan for Big River Zinc

Todd,
I tried to call today about the problems you have with our revised contingency plan. Our attorney called me yesterday and told me there were some problems with the Emergency contact, Police, Fire, Hospital, etc. I would like to fix the problems and make sure we are doing everything correctly.
mike

Michael Altepeter
Senior Process Engineer/Environmental Manager
Big River Zinc
maltepeter@bigriverzinc.com
618 274 5000 x 194

RCRA CONTINGENCY PLAN
AND EMERGENCY RESPONSE PROCEDURES

BIG RIVER ZINC CORPORATION
SAUGET, ILLINOIS

Revised August 4, 2009

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APPENDICES

Figures

1.0 INTRODUCTION

This RCRA Contingency Plan and associated Emergency Response Procedures (ERP) have been prepared for the Big River Zinc Corporation (BRZ) facility in Sauget, Illinois, in compliance with the requirements outlined in the U.S. Environmental Protection Agency (USEPA) rules and regulations for the Resource Conservation and Recovery Act (RCRA) - Hazardous Waste 40 CFR Part 264. Specifically, this document contains the requirements set forth by RCRA regarding a facility's Contingency Plan and Emergency Procedures for the accidental release of hazardous waste (40 CFR Part 264, Subpart D).

This Plan will be updated if the plan fails in an emergency, the facility changes in a way that increases the potential for fires, explosions, or releases of hazardous waste, or there is a change in the emergency coordinators or emergency equipment lists.

2.0 DESCRIPTION OF FACILITY

Big River Zinc Corporation (BRZ), Sauget, Illinois is engaged in the production of zinc. Sulfuric acid, copper cake, lead/silver concentrate, copper precipitate, and cadmium oxide are sold as by-products. The manufacturing process begins with fluid bed roasting of zinc sulfide concentrates. Sulfur dioxide is produced during the roasting process and is used to create sulfuric acid. The impure zinc oxide from the roaster is treated in several stages with sulfuric acid to leach out metals such as zinc, copper, cobalt, and cadmium. These metals are recovered and are sold as by-products to other industries, as is the lead and silver contained in the insoluble lead concentrate recovered from the leaching steps. The zinc goes through several additional steps and is recovered from solution by an electrowinning process. The sheets are washed and fed into an electric- induction-melting furnace. The zinc is then poured into a mold, cooled, and shipped to the customers.

The facility is located at Route 3 and Monsanto Ave., Sauget, Illinois (Figure 1). The facility has three production shifts. Facility personnel are on site 24 hours per day, 7 days per week. The facility property is oriented on a north-south axis and comprises 35.4 acres with approximately 60% of the property under roof or paved.

BRZ has one hazardous waste roll-off container, which is located west of the cadmium building. Filters containing metals are disposed of in the roll-off container. The roll-off is emptied at least every 90 days.

3.0. EMERGENCY REPORTING PROCEDURES

At all times, there is at least one employee at the facility or individuals who can be contacted with the responsibility for coordinating all internal emergency response measures at the facility. As required by federal regulations, the Emergency Coordinator (EC), or his alternate, is thoroughly familiar with all aspects of the ERP, all operations and activities at the facility, and the location of appropriate facility records. The EC and alternates may be reached through the security department.

3.1 Implementation of the Emergency Response Plan

The primary or the alternate Emergency Coordinators will decide which portions of this ERP are to be implemented following an evaluation of the site conditions. The basis of the EC's decision is his assessment of the magnitude of the emergency. The EC will determine if the emergency presents an actual or possible threat to human health and the environment, or if Big River Zinc personnel can control the situation.

Some types of emergencies that require full implementation of the ERP include:

- A fire that could spread off site;
- A fire that is too large to extinguish with a portable fire extinguisher;
- A spill or release of hazardous material that results in airborne constituents; and
- Uncontainable runoff due to a large fire, spill or release of material.

3.2 Internal Notification Procedures

Personnel

Upon discovering a situation that may represent an emergency, plant personnel will:

a. Report the situation to a supervisor immediately or call security if the supervisor cannot be found immediately; and

b. Verbally warn other personnel if the situation is an immediate threat to their safety.

Supervisor/Security

When notified of an emergency situation, the supervisor/security will:

a. Take necessary steps to prevent injury to personnel, damage to equipment, and any potential fire hazard; and

b. Contact the Emergency Coordinator or alternate.

Emergency Coordinator

The primary EC (or an alternate) will follow the procedures below in the event of a release, explosion, fire, or other emergency:

- Assess the situation and if warranted:

  Declare an emergency and notify all plant personnel with instructions by two-way radios. If there is a release, fire, or explosion that could threaten human health or environment outside the facility, the EC is to immediately declare an emergency.

  Notify security to call for police and/or fire department. The police or fire departments have the responsibility for coordinating outside response efforts. Telephone numbers of emergency response agencies are located in Section 3.3. A two-way radio connection is also available in the security office for contacting the police and fire departments.

- Commit and direct activities of any and all resources available that are necessary to carry out the ERP. The EC will focus on measures to eliminate potential harm to human health and the environment.

Whenever there is a release, fire, or explosion, the EC will act without delay to identify the character, exact source, amount, and aerial extent of the released materials. This may be accomplished by observation or review of facility records, manifests, and, if necessary, by chemical analysis. The EC will inspect for possible hazards to human health or the environment, both direct and indirect. This assessment will consider onsite and offsite effects as required.

Throughout the emergency, the EC will take measures, which are reasonable and necessary to ensure that fires and/or releases do not have an effect on any other substances at the facility.

3.3 Emergency Contact Phone List

Security	Ext. 110 (Internal Plant Phone) (618) 274-5000 ext. 110 (Outside Phone) Plant Radio
Primary Emergency Coordinator	
Mike Altepeter	(618) 274-5000 Ext.194 (office) (314) 846-8093 (Home) (618) 410-8021 (cell)
Home Address	2936 Point Drive St. Louis, MO 63129
Alternate Emergency Coordinator	
Anthony Thomas	(618) 274-5000 Ext. 198 (office) (618) 410-8020 (cell)
Second Alternate Emergency Coordinator	
Tom Gallagher	(618) 274 5000 ext 262 (office) (618) 444 5274 (cell)
Home Address	73 Edgewood drive Sullivan, MO 63080

Federal	National Response Center (Release of Hazardous Substances)	(800) 424-8802
	USEPA Region V	(312) 353-2000
State	Illinois Emergency Management Agency	(800) 782-7860

Local Emergency Response: Sauget Police, Fire, Ambulance 911

Local Emergency Planning Committee (LEPC) (618) 277-3012

Mr. Don Feher
Local Emergency Planning Committee
321 W. "F" Street
Belleville IL 62220-1193

Hospital

Memorial Hospital Emergency (618) 257-5840
Attn. Mr. Don Schneider
4500 Memorial Drive
Belleville, IL 62226

Contractor Support

Heritage Environmental (800) 388-3500
Attn: Mr. Dan Hans
1188 Pershall Road
Bellfountaine, MO 63137

Onyx Industrial Services (618) 931 0010
Fred Davidson
121 East Chain of Rocks Road
Mitchell, IL 62040

Bellon Environmental Company (314) 890 8600
Bob Goodman
600 Fairview
St. Louis, MO 63132

A copy of the plan and updates to the plan will be sent to the Sauget Fire and Police Departments, the LEPC, Memorial Hospital and the contractors mentioned by registered mail return receipt requested. The return receipts will be filed. A representative of each will be contacted by telephone and the outcome of the conversions recorded and kept on file.

3.4 Evacuation Plan

The EC will assist the fire department in determining the need for evacuation of the area surrounding the plant. This assessment is based on the EC's knowledge of the hazardous materials involved, the site conditions, and the current weather conditions. The role of the EC in this situation is an advisory one, and the decision to evacuate an area is the responsibility of the appropriate agencies.

The EC and alternates are responsible for the plant-wide evacuations only. Designated evacuation routes for plant personnel are displayed on Figure 2. Communication of evacuation to employees is by two-way radios, alarms, intercom, and other personnel to insure that all employees are informed and evacuated.

The fire alarms are tested monthly to ensure they are in proper working condition. If an evacuation is ordered, plant personnel shall discontinue operation of all equipment and evacuate the area as soon as possible. Evacuation routes are determined according to the plant area affected.

Upon receiving instruction by two-way radio or by activation of an audible warning device, supervisors are to instruct employees to leave the facility according to their predetermined exit routes. The employees are to go to the designated assembly point, west of the facility, in the employee parking lot. Once the plant is evacuated, the supervisor of each area takes a prompt and accurate account of all personnel to ensure that everyone is accounted for.

The fire department is responsible for evacuation plans within the surrounding area and for coordinating local resources, including the police department and hospitals to assist in the implementation of the evacuation plan.

The EC, in consultation with the fire department and other local agencies, as necessary, will decide when reoccupation of the facility is possible. Only after following all the post-emergency procedures (see Section 5.0) can the facility resume operation.

3.5 Emergency Response Procedures

3.5.1 Fire and Explosion Emergency Response

An employee, upon detecting a fire or imminent explosion in the facility, will initiate the following actions:

- Use hand-held fire extinguishers to control or extinguish the fire if the fire is in an initial, controllable stage and no potential for imminent explosion exists.
- Contact his supervisor or security. Security will locate the EC and inform him of the fire and its location. Activate the alarm system. The supervisor will begin response preparation.
- Upon receiving available information, the EC or security will call the fire department to inform them of the situation and receive instruction.

After following the steps outlined above for emergency situations, the EC or, in his absence, the supervisor, must do the following:

- Take action to shut off electrical power and any gas in the vicinity of the fire location. Stop process and/or operations that may interfere with the emergency response actions;

- Take action, if necessary and safe to do so, to place absorbent materials around drains to prevent spilled hazardous waste from entering the sewer system;
- Notify all unauthorized personnel to vacate the area per evacuation plans; and
- Follow any instruction given by the fire department.

In addition, the EC must also:

- Note the current weather conditions and estimate the current wind direction and speed;
- Identify the character, source, amount, and aerial extent of any released hazardous materials by observation and review of facility records, manifests, and, if necessary, by chemical analysis; and
- Determine if the situation necessitates complete evacuation of the plant site. Furthermore, the EC will assist the Fire Department in their decision to evacuate the surrounding area.

If the situation meets the criteria for full implementation, at the first opportunity, the EC shall report the emergency to the National Response Center **(800-424-8802)** and the Illinois Emergency Management Agency **(800-782-7860)**. This verbal report includes:

- Name, address, and telephone number of the reporter;
- Name and address of the facility;
- Time and type of incident;
- Name and reportable quantity of material involved to the extent known;
- Extent of injuries, if any; and
- Possible hazards offsite to human health and the environment.

3.5.2 Spill Emergency Response

Any employee discovering a hazardous waste spill is to immediately notify his supervisor or security. Security will notify the EC or alternate. The EC will assess the situation and act as follows:

- Clear the area of unauthorized personnel. Stop process and/or operations that may interfere with the emergency response;

- Identify the source or cause of the release material and obtain a Material Safety Data Sheet(s) (MSDS). Use MSDS information to guide response and determine personal protective equipment (PPE) required;
- Direct trained personnel to don the appropriate PPE, as used in normal job duties, and re-containerize the spilled material;
- Alert local authorities if material may reach outside facility property;
- Rope off and/or barricade the area to prevent entry of unauthorized personnel;
- Take measures to contain the spill;
- Direct cleanup so that all hazardous materials are placed in properly labeled containers;
- Ensure that spill material, water, and adsorbents are placed in Department of Transportation (DOT) approved containers for ultimate disposal; and
- Insure that no incompatible wastes are stored within the spill area until cleanup is complete.

4.0 RELEASE REPORTING REQUIREMENTS

4.1 General

In the event of external release of a hazardous material, the procedures outlined in Section 3.0 will be followed. Prior to contacting state and local agencies, the EC will gather as much information about the incident as quickly as possible. The concerned agencies will then be contacted with initial information. The appropriate agencies will be kept informed of any new, additional, or changed information regarding the incident.

4.2 Release of RCRA Hazardous Waste

In case of a fire, explosion, or release of hazardous waste (equal to or greater than the reportable quantity for the material), as defined under RCRA (40 CFR, Section 261) which could threaten human health or the environment outside the facility, concerned agencies will be contacted as soon as possible by the EC. If the evacuation of surrounding areas may be required, local emergency response teams will be alerted. The following agencies will be contacted by the EC:

Federal	National Response Center	(800) 424-8802
	USEPA Region V	(312) 353-2000
State	Illinois Emergency Management Agency	(800) 782-7860
Local	Sauget Fire, Police, Ambulance	911
	Mr. Don Feher Local Emergency Planning Committee (LEPC) 321 W. "F" Street Belleville, IL 62220-1193	(618) 277-3012

Contractor Support:

Heritage Environmental Attn. Mr. Dan Hans 1188 Pershall Road Bellfountaine, MO 63137	(800) 377-2440

Or

Onyx Industrial Services Fred Davidson 121 East Chain-of- Rocks Road Mitchell, IL 62040	(618) 931 0010

Bellon Environmental Company (314) 890 8600
Bob Goodman
600 Fairview
St. Louis, MO 63132

5.0 POST-EMERGENCY PROCEDURES

When the emergency is contained, and a threat to human health and the environment no longer exists, the EC will take the following post-emergency actions:

- Decontamination/cleanup;
- Waste management;
- Post-emergency reporting; and
- Post-emergency assessment.

5.1 Decontamination/Cleanup

All of the equipment used in the emergency response procedures will be either decontaminated or properly containerized for disposal. Any non-emergency response equipment, such as materials or machinery, also affected by the emergency response will be decontaminated or disposed. The EC is responsible for arranging immediate replacement of any spent emergency response materials.

5.2 Waste Management

Waste residual materials, along with emergency response equipment needing disposal, will be collected and containerized in accordance with applicable regulations governing the management of such materials. Once all hazardous material is properly containerized, storage and disposal will be conducted according to applicable regulations.

5.3 Post-Emergency Reporting

The EC is responsible for ensuring the preparation and submittal of all required reports. A release, fire or explosion requires a written report to the USEPA Region V within 15 days of the event and the IEPA upon request only. The report will include:

- Name, address, and telephone number of the facility;
- USEPA identification number for the site;

- Date, time, and type of incident (e.g., fire, spill, etc.);
- Name and quantity of material(s) involved;
- Extent of injuries, if any;
- Assessment of any actual or potential hazards to human health or the environment;
- Procedures followed to reduce and remove released materials;
- Estimated quantity and disposition of the recovered material that resulted from the incident;
- Corrective measures taken;
- Whether an evacuation was required; and
- Name of individuals who have also been contacted or notified.

5.4 Post-Emergency Assessment

After the emergency episode, the EC will determine the causes of the emergency and analyze the effectiveness of emergency response procedures. The ERP will be modified if it is determined that procedures are inadequate or ineffective. If equipment capabilities are found unacceptable, necessary improvements will be made.

6.0 EMERGENCY EQUIPMENT

6.1 Communication Systems

Four different communication systems are available in the case of an emergency. They are described below.

Type	Description	Inspection Required
Two-Way Radios	The base station for the two-way radios is located in the main Security Office at the main gatehouse. Six two-way radios are located in the security department. Each of the four departments has a minimum of two radios that are normally carried by the supervisors. Many of the operators also have two-way radios. Fourteen radios are assigned to maintenance supervisors and the "rotating shift" electrician and mechanic. Two-way radio communications with the police and fire departments of Sauget is available to security. A weather monitor is available 24-hours per day in case of a weather emergency.	Radios are in use daily so any problems with the system or individual radios would be detected immediately.
Telephones	There are three lines into the Security Office. Telephones are located in all supervisors offices, all control rooms, all administrative offices, and in various maintenance areas. Inner plant phones do not have access to outside lines so security must be called in case of emergency.	Telephones are in use daily so any problems would be detected immediately.
Cell Phones	There are 19 Cell Phones issued to Key company management personnel. These can be used to contact people needed while outside or inside the plant. The cell phones can be used as normal phone or "walkie talkie" mode.	The cell phones are in use daily so any problems would be detected immediately.
Message Center Operations	A continuing liaison can be maintained through the Security Office for needed information by using the telephone communications. However, emergency communications would generally be handled through the two-way radios and Cell Phones for faster response time.	N/A

6.2 Fire Equipment

Fire response equipment is located throughout the facility. This includes sprinkler systems, hand held fire extinguishers, and fire equipment boxes.

A smoke detection system is located in the computer room on the bottom floor of the administrative building and in the Safety Office. These systems sound in the main security office when activated. Five automatic deluge sprinkler systems are located throughout the plant. These systems and the twelve fire hydrants are supplied with water under pressure through the fire protection pump. An alarm siren and warning light are located on the outside of the building to alert personnel that the system is in use. The sprinkler systems are checked once a month by the maintenance department.

A list of the location and contents of the hand held fire extinguishers is located in Table 1 of Appendix B. The department supervisors inspect the extinguishers on a weekly basis. Documented inspections of the fire extinguishers are located in the safety department. In other areas, a designated person inspects the extinguishers on a monthly basis. Fire extinguisher training is held annually for all employees. No employees are trained when hired.

There are seven fire equipment boxes located throughout the facility. A list of these locations and contents of the boxes are provided in Table 2 of Appendix B. The boxes are inspected on a monthly basis by the security department.

6.3 Personnel Protective Equipment

In case of a release, fire, or explosion, goggles, face shields, respiratory protection, full body acid suits, and barrier cream are available from the Safety Department. Rubber dielectric boots, heavy-duty rubber gloves, neoprene gloves, vinyl and latex gloves, and Tyvek disposable clothing are available from the storeroom.

6.4 First Aid

Stretchers are available in the foreman's office of every department. Safety showers are located at various locations in each department. Stokes basket and confined space rescue equipment are stored in the respirator room.

6.5 Spill Response Kits

Spill response kits containing appropriate tools and sorbent materials are located throughout the facility. A list of the spill kits and their locations are presented in Table 3 of Appendix B.

7.0 Training

Copies of all training documents will be kept in the Environmental manager's files and in Safety dept files, and on the Server. Please refer to the RCRA training document for a detailed description on training. As a minimum the program will document:

a. The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job.
b. A written job description for each position described above.
c. A written description of the type and amount (RCRA Training Document) of both introductory and continuing training that will be given to each person described above.
d. Training records detailing training given will be kept for at least three years from the date the employee last worked for the company.

APPENDIX A

FACILITY SITE DIAGRAMS

APPENDIX B

EQUIPMENT TABLES

Table 1
Location and Content of Fire Equipment Boxes
Big River Zinc Corporation
Sauget, Illinois

Box Number	Location
A	South of main Casting Dept. - East of the South Contracting Gate
B	South of the Vehicle Shop along the West fence line
C	East of Cell room along East fence line
D	East of Leach/Purification along East fence line
E	East of the Specialty Casting Building - West of Cell room Unit #3
F	At the Oil House
G	Northwest of the Acid Plant Converter, by the railroad tracks

Contents of Fire Equipment Boxes

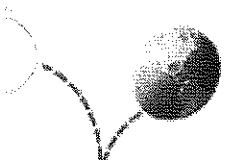
QUANTITY	ITEM	DESCRIPTION	USE/CAPABILITIES
One	1 1/2 in. Nozzle	Brass nozzle, Combination, Adjusts to fog or straight stream	Enable user to adjust stream of water for the need at the time of a fire.
One	Reducer	Threaded reducer 2.5" by 1.5"	To connect hydrant outlet to the smaller fire hose
Two	Universal Spanner Wrenches	Cast aluminum 'C' shaped wrench.	Use to tighten reducer to hydrant and to connect fire hoses.
One	Hydrant Wrench	Adjustable combination hydrant and spanner wrench	Used to open the hydrant by turning the top post.
Three	Fire Hoses	50 foot sections of 1 1/2 in. industrial strength fire hose	Use to make hose capable of reaching a fire.
One	Axe	Wood handle fireman axe	Use to break open items so water can reach fire.

Table 2
Spill Response Kit Locations and Contents
Big River Zinc Corporation
Sauget, Illinois

Spill Kit #	Name of SPCC Area	Location Description	Contents Code
1	Drum Storage Area # 2	Roaster Mechanics area outside the south outer wall	1
2	#5 Substation-pad mounted transformer	Inside doorway, SE corner of skimmings plant	1
3	Waste Oil # 2	Outside the NW corner of the oil house	1
4	Diesel & Gasoline dispensing area	Above ground tanks, located west of RR tracks and S of cafeteria	1
5	Waste Oil # 1	Outside of building at the SW corner of the vehicle shop	1
6	Substation # 13A & 13B Pad mounted transformer	Substation located N of special casting & S of the purified storage tanks	1
7	# 4 Substation transformer	Inside E wall of the special casting bldg. N of the T-metal furnace	1
8	Substation # 6, 6A & 6B, Pad mounted transformer	S end of the main casting bldg. Inside the fenced area of the transformer yard	1
9	Substation # 11, Pad mounted transformer	S of cell room unit # 3	1
10	Satellite Kerosene storage tank (winter only)	Outside SE corner of the Quonset storage	1
11	Substation # 1, Pad mounted transformer	Fenced transformer area, south end of cell room	1
12	Substation # 2, Pad mounted transformer	SE corner of fenced transformer yard, S end of cell room	1
13	Substation # 9, Pad mounted transformer	E side of ground level L/P, south of residue loading	1
14	Hazardous waste storage	Satellite stations for oil dry in vehicle shop and oil shed. Satellite station for parts washer in Vehicle shop	2

Contents Code 1	**Contents**	**Use/capabilities**
	6 ea. 3' x 10' adsorbent socks	Used to contain hazardous flowing material absorb it and preventing the contaminant from reaching sewer or groundwater.
	4 ea. Adsorbent Pillows	Used to directly absorb flowing contaminant
	75 ea. Absorbent mats	Used to directly absorb flowing contaminant and wipe down equipment
	10 ea. bags and ties	Used to contain used socks pillows, mats, and other contaminated material and transfer to Waste containers.

Contents Code 2	**Contents**	**Use/capabilities**
	Shovel	Pick up spilled solid waste and return to container
	Push Broom	Push waste into pile for removal with shovel
	Fire extinguisher	Extinguish fire
	Absorbent material	To place on dusty waste to keep it from becoming airborne and facilitate returning to container



Todd Brown /R5/USEPA/US
08/04/2009 01:01 PM

To "Mike Altepeter" <maltepeter@bigriverzinc.com>
cc
bcc Karen Peaceman/R5/USEPA/US@EPA
Subject Re: Contingency plan for Big River Zinc

Dear Mr. Altepeter:

My apologies for taking several days to reply. I have been out of the office.

Below is the issue with Big River Zinc's current contingency plan that I believe still requires correction. If this can be corrected prior to EPA filing the Consent Agreement and Final Order, EPA can remove this issue from the Order. However, we would like it to be corrected in the next couple of days if possible, as we need to file this Order shortly. Alternatively, we can agree to leave this requirement in the Order, and you can fix it after the Order is filed, in accordance with the schedule of the Order (i believe the draft Order currently requires this to be corrected with 2 weeks or so of the filing of the order).

Current Contingency Plan Issue

35 IAC 722.134(a)(4) and 725.137 requires that hazardous waste generators attempt to make arrangements with certain emergency response organizations (e.g., police, fire department, hospitals, etc.), as appropriate for the type of waste handled at the facility and the potential need for the services of those organizations. If these emergency response organizations decline to enter into the arrangements, then the generator must document the refusal. **35 IAC 725.152(c)** requires that these arrangements be described in your contingency plan.

I have pasted the required arrangements, as spelled out in the regulations, below for your convenience. I do not see where these arrangements are currently described in your contingency plan. If you believe they are, please call me and help me understand what I am missing. I would be happy to discuss. Otherwise, EPA simply needs Big River Zinc to include a description of the arraignments that have been made in its contingency plan (or make the arrangements if they have not already been made).

If you make the corrections, please forward the corrected plan, or pages of the plan, to me via e-mail or fax. My fax is 312-692-2573.

Thank you in advance for your cooperation in this matter.

Sincerely,

Todd C. Brown
U.S. EPA - Region 5
Land & Chemicals Division
RCRA Branch
(312) 886-6091
brown.todd@epa.gov

Section 725.137 Arrangements with Local Authorities

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1) Arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility and possible evacuation routes;

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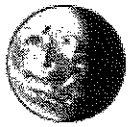
"Mike Altepeter" <maltepeter@bigriverzinc.com>



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07/30/2009 02:05 PM

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cc
bcc

Subject Contingency plan for Big River Zinc

History: This message has been replied to.

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"Mike Altepeter"
<maltepeter@bigriverzinc.com>
02/13/2009 09:26 AM

To Todd Brown/R5/USEPA/US@EPA
cc
bcc

Subject Request for Information

Todd,

Our Attorney just sent me an e mail saying that you had not received our reply. She asked I fax a copy. I saved a scanned copy so I have attached it to this e mail.

I sent it registered mail and tracked it to the East St Louis Post Office. I have no clue as to why it is there. We just sent someone there yesterday to pick up a registered letter and it was the request you sent me that we never received.

I am sorry I thought you had this all the time.

I will print and mail another copy that is more legible that the scanned one attached to this e mail.

Mike

Michael Altepeter
Senior Process Engineer/Environmental Manager
Big River Zinc
maltepeter@bigriverzinc.com
618 274 5000 x 194

Entire reply to region V on pdf Jan 2008.pdf

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

FEB 0 3 2009

REPLY TO THE ATTENTION OF:
LR-8J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Gary King
Acting Chief
Bureau of Land
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276

Re: Big River Zinc Corporation
EPA I.D. No.: ILD062444435

Dear Mr. King:

Pursuant to Section 3008(a)(2) of the Resource Conservation and Recovery Act, as amended, I am providing notice to you that the U.S. Environmental Protection Agency is preparing to issue an Order under Section 3008(a)(1) to Big River Zinc Corporation. The Order is in response to the September 19, 2007, inspection by EPA and addresses violations of the Standards Applicable to Generators of Hazardous Waste.

If you have any questions regarding this letter, please contact Todd Brown of my staff at (312) 886-6091.

Sincerely,

Willie H. Harris

Willie H. Harris, P.E.
Chief, RCRA Branch
Land and Chemicals Division

cc: Todd Marvel, Illinois EPA

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Gary King
Bureau of Land
IEPA
1021 North Grand Avenue East
Springfield, IL 62794-9276

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)* | B. Date of Delivery

Illinois Environmental Protection Agency
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276

C. Signature

X

☐ Agent
☐ Addressee

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

Ryan Horn

3. Service Type
☑ Certified Mail ☐ Express Mail
☐ Registered ☑ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. Article Number
(Transfer from service label) 7001 0320 0005 8922 3813

PS Form 3811, March 2001 Domestic Return Receipt 102595-01-M-1424

5270284053 015

bcc: Branch File
Official File
Author
ORC

Land and Chemicals Division

Type of Document:
- ☐ Notice of Violation and Inspection Report/Checklist
- ☐ No Violation Letter and Inspection Report/Checklist
- ☐ Letter of Acknowledgment
- ☐ Information Request
- ☐ Pre-Filing and Opportunity to Confer
- ☒ State Notification of Enforcement Action
- ☐ Return to Compliance
- ☐ SNC Memo

Facility Name: Big River Zinc Corporation

Facility Location: 2401 Mississippi Avenue.

City: Sauget **State:** Illinois

U.S. EPA ID#: ILD062444435

Assigned Staff: Todd Brown **Phone:** 312-886-6091

Name	Signature	Date
Author	Todd Brown	1/27/09
Regional Counsel	Karen Peaceman	1/27/09
Section Chief	Tamra M. Faulkner	1/27/09
Branch Chief	Willie A. Harris	1/29/09
Division Director		

1-27-09 HC 1-27-09

Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
   - One copy for the assigned staff;
   - One copy for the section file;
   - One copy for the branch file; and
   - One copy for the official file.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.

Once the certified mail receipt is returned:

5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JAN 07 2009

REPLY TO THE ATTENTION OF:

LR-8J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

George Obeldobel
President
Big River Zinc Corporation
2401 Mississippi Avenue
Sauget, Illinois 62201

Re: Request for Information
EPA ID No.: ILD062444435

Dear Mr. Obeldobel:

By this letter, the U.S. Environmental Protection Agency requests information under Section 3007 of the Resource Conservation Act (RCRA), as amended, 42 U.S.C. § 6927. Section 3007 authorizes the Administrator of EPA to require you to submit certain information.

This request requires Big River Zinc Corporation ("BRZ" or "you") to submit certain information relating to the storage of hazardous waste at its facility located at 2401 Mississippi Avenue in Sauget, Illinois. We are requiring this information to determine BRZ's compliance status with the Standards Applicable to Generators of Hazardous Waste and the Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities set forth at Title 35 of the Illinois Administrative Code (35 IAC), Parts 722 and 724, respectively. The enclosure specifies the information you must submit. You must submit this information within **14** calendar days of receiving this request to the United States Environmental Protection Agency, Attention: Todd C. Brown, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

You may, under 40 CFR Part 2 Subpart B, assert a business confidentiality claim covering all or part of the information in the manner described in 40 CFR § 2.203(b). We will disclose the information covered by a business confidentiality claim only to extent and by means of the procedures at 40 CFR Part 2, Subpart B. You must make any request for confidentiality when you submit the information since any information not so identified may be made available to the public without further notice.

BRZ must submit all requested information under an authorized signature certifying that the information is true and complete to the best of the signatory's knowledge and belief. Should

the signatory find, at any time after submitting the requested information, that any portion of the submitted information is false, misleading or incomplete, the signatory should notify us. Knowingly providing false information, in response to this request, may be actionable under 18 U.S.C. §§ 1001 and 1341. We may use the requested information in an administrative, civil or criminal action.

This request is not subject to the Paperwork Reduction Act, U.S.C. § 3501 et seq., because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

Failure to comply fully with this request for information may subject BRZ to an enforcement action under Section 3008 of RCRA, 42 U.S.C. § 6928.

You should direct questions about this request for information to Mr. Brown, of my staff, at (312) 886-6091.

Sincerely,

Lorna M. Jereza
Chief, Compliance Section 1
RCRA Branch
Land and Chemicals Division

Enclosure

cc: Todd Marvel, Illinois Environmental Protection Agency (w/ enclosure)
Julie O'Keefe, Armstrong Teasdale LLP (w/ enclosure)

REQUEST FOR INFORMATION

Instructions: You must respond separately to each of the questions or requests in this attachment. Precede each answer with the number of the Request for Information to which it corresponds. For each document produced in response to this Request for Information, indicate on the document, or in some other reasonable manner, the number of the question to which it responds.

Requests

1. Identify all persons consulted in preparing the answers to this Request for Information. Provide the full name and title for each individual identified, business telephone number for each individual identified, and the number of years that each individual has worked for BRZ.

2. Please provide true and accurate copies of all records that report the results of the analyses conducted on samples taken from the demolition of the Leach Building, including the analytical results obtained from any samples taken from demolished concrete, wood and brick.

3. Please describe the condition of the Concrete Concentrate Storage Pad located on the northeast corner of the plant, which was used by BRZ to store hazardous waste debris generated from its demolition activities. In particular:

    a. identify any cracks or gaps in the floor of the concrete pad;
    b. describe any coatings or sealants existing on the surface of the concrete pad;
    c. describe the walls or barriers around the concrete pad;
    d. provide information regarding any inspections or maintenance of the concrete pad by BRZ in the last ten years; and
    e. describe in detail how runoff from the concrete pad is managed.

4. State whether the pile of contaminated wood located immediately to the west of the Concentrate Storage Building and observed by the U.S. EPA inspector during the September 19, 2007 EPA inspection (featured in photograph 11 of the corresponding inspection report) was also located on the Concrete Concentrate Storage Pad.

5. If the answer to 4, above, is negative, describe the condition of the surface upon which the pile of contaminated wood was located. In particular:

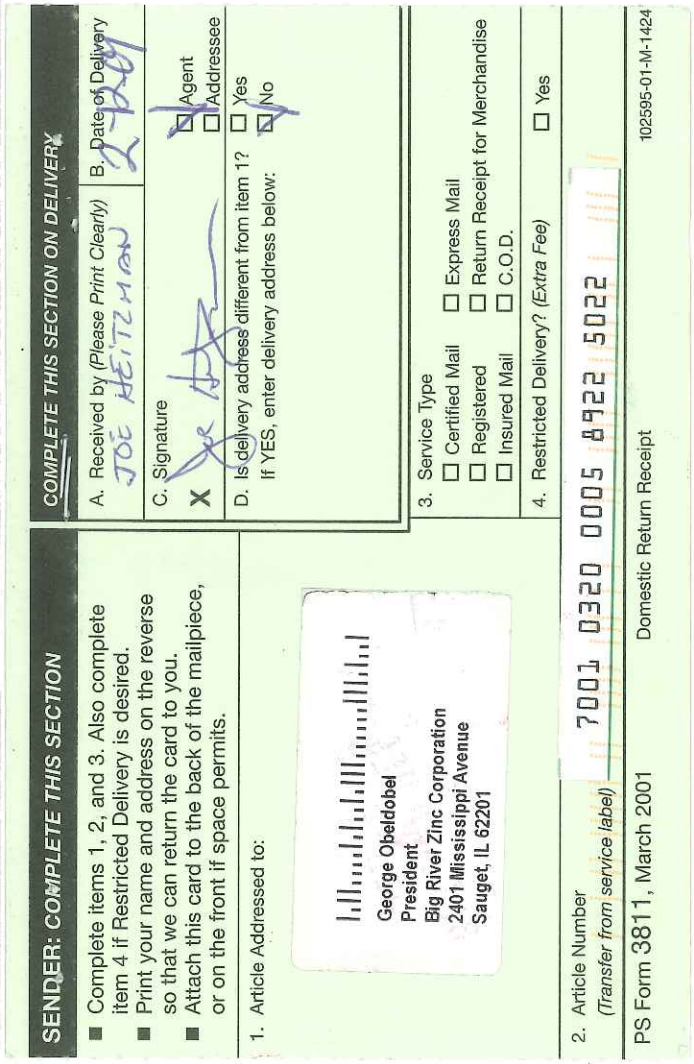
    a. identify if there was any concrete or other surface separating the pile from the underlying soil;
    b. if the answer to 5a, above, is affirmative, identify any cracks or gaps in the concrete or surface material;
    c. if the answer to 5a, above, is affirmative, describe any coatings or sealants existing on the concrete or surface material;

d. if the answer to 5a, above, is affirmative, provide information regarding any inspections or maintenance of the concrete or surface conducted by BRZ in the last ten years; and
e. describe in detail how runoff from the area is managed.

6. Please provide a copy of Big River Zinc's Hazardous Waste Contingency Plan as it existed on September 19, 2007.

7. Provide the following certification by a responsible corporate officer:

I certify under the penalty of law that I have examined and am familiar with the information submitted in responding to this information request for production of documents. Based on my review of all relevant documents and inquiring of those individuals immediately responsible for providing all relevant information and documents, I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.



Land and Chemicals Division

Type of Document:
- ☐ Notice of Violation and Inspection Report/Checklist
- ☐ No Violation Letter and Inspection Report/Checklist
- ☐ Letter of Acknowledgment
- ☒ Information Request
- ☐ Pre-Filing and Opportunity to Confer
- ☐ State Notification of Enforcement Action
- ☐ Return to Compliance

Facility Name: Big River Zinc Corporation

Facility Location: 2401 Mississippi Avenue

City: Sauget **State:** Illinois

U.S. EPA ID#: ILD062444435

Assigned Staff: Todd Brown **Phone:** 312-886-6091

Name	Signature	Date
Author	Todd Brown	1/5/09
Regional Counsel	Karen Flemm	1/6/09
Section Chief	Lanna M. Jones	1/6/09
Branch Chief		

Directions/Request for Clerical Support:

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3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.

Once the certified mail receipt is returned:

5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

"Mike Altepeter" <maltepeter@bigriverzinc.com>
01/26/2009 01:19 PM

To

Subject Request for Infomation

History: This message has been forwarded.

Todd,

First, I am writing an e-mail because the phones here are dead. Apparently the power supply is gone until tomorrow sometime.
Next, I have only some of the answers because of a mix up somewhere. Our attorney said that the request was coming and we should look for it. I asked our attorney about it last week and she had received it but we had not. She forwarded it to us last Thursday in an e mail.

I have most of the information, but I cannot inspect the ore pad for cracks because half the pad is covered with ice and it is entirely covered with snow. (My buggy actually broke through the ice at one point and I had to get rescued by one of our large earth movers.) It is supposed to remain cold here for the rest of the week anyway.

At this point, what should I do?

Thanks

Mike

Michael Altepeter
Senior Process Engineer/Environmental Manager
Big River Zinc
maltepeter@bigriverzinc.com
618 274 5000 x 194

Todd Brown/R5/USEPA/US
01/26/2009 02:10 PM

To "Mike Altepeter" <maltepeter@bigriverzinc.com>
cc
bcc Karen Peaceman/R5/USEPA/US@EPA
Subject Re: Request for Information

Dear Mr. Altepeter:

Sorry to hear of your difficulties with power and ice down in Sauget

I do not know why you did not receive a copy of the Information Request. Our records show that it was mailed to Mr. Obeldobel on January 7, and Ms. O'Keefe was copied as a courtesy. All I can guess is that the letter is lost or delayed in the mail for some reason.

As for answering the Information Request. I am assuming from your e-mail that Big River Zinc is only unable to provide answers to portions of questions 3 and 5 due to the current whether conditions. We would request then that Big River Zinc submit responses at this time to those questions in the Information Request that Big River Zinc is capable of answering at this time. For those questions that cannot be answered at this time, please provide a brief written explanation for the record.

If you have any questions please feel free to contact me by phone (when working again) or e-mail.

Sincerely,

Todd C. Brown
U.S. EPA - Region 5
Land & Chemicals Division
RCRA Branch
(312) 886-6091
brown.todd@epa.gov

"Mike Altepeter" <maltepeter@bigriverzinc.com>

"Mike Altepeter" <maltepeter@bigriverzinc.com>
01/26/2009 01:19 PM

To Todd Brown/R5/USEPA/US@EPA
cc

Subject Request for Infomation

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Mike

Michael Altepeter
Senior Process Engineer/Environmental Manager
Big River Zinc
maltepeter@bigriverzinc.com
618 274 5000 x 194

"Mike Altepeter" <maltepeter@bigriverzinc.com>

01/26/2009 02:20 PM

To Todd Brown/R5/USEPA/US@EPA

cc "Julie O'Keefe" <JOKEEFE@ArmstrongTeasdale.com>, "George Obeldobel \(George Obeldobel\)" <Gobeldobel@bigriverzinc.com>

bcc

Subject RE: Request for Information

History: This message has been replied to and forwarded.

Todd,
I am glad you sent the courtesy copy because we still have nothing here at BRZ.
I shall do as you say.
Mike

-----Original Message-----
From: Brown.Todd@epamail.epa.gov [mailto:Brown.Todd@epamail.epa.gov]
Sent: Monday, January 26, 2009 2:10 PM
To: Mike Altepeter
Subject: Re: Request for Information

Dear Mr. Altepeter:

Sorry to hear of your difficulties with power and ice down in Sauget

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Sincerely,

Todd C. Brown
U.S. EPA - Region 5
Land & Chemicals Division
RCRA Branch
(312) 886-6091
brown.todd@epa.gov

http://www.epa.gov/compliance/complaints/index.html

"Mike Altepeter" <maltepeter@bigriverzinc.com>

01/26/2009 01:19 PM

To: Todd Brown/R5/USEPA/US@EPA

cc:

Subject: Request for Infomation

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Mike

Michael Altepeter
Senior Process Engineer/Environmental Manager
Big River Zinc
maltepeter@bigriverzinc.com
618 274 5000 x 194

PDC Laboratories, Inc.
3278 N. Highway 67 • Florissant, MO 63033
(314) 432-0550 • (800) 333-FAST (3278) • FAX (314) 432-4977

ACCREDITED IN ACCORDANCE WITH

Laboratory Results

Big River Zinc
Rt. 3 & Monsanto Ave.

Sauget, IL 62201
Attn : Mr. Mike Altepeter

Date Received :08/21/07 16:04
Report Date :08/23/07
Customer # :201097
P.O. Number :34339
Facility :

Sample No: **07088355-4** Collect Date **08/21/07 09:20**
Client ID : **LEACH FLOOR** Site : **STL** Locator :

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 1311				
Final pH		7.34	08/22/07 12:30	MEP,FM
Leachate Preparation			08/22/07 12:30	MEP,FM
SW-846 3010A				
Sample Preparation			08/23/07 08:00	JS
SW-846 6010 TCLP				
Arsenic, TCLP	<	0.03 mg/l	08/23/07 11:39	WPS
Barium, TCLP		0.56 mg/l	08/23/07 11:39	WPS
Cadmium, TCLP		0.02 mg/l	08/23/07 11:39	WPS
Chromium, TCLP		0.064 mg/l	08/23/07 11:39	WPS
Lead, TCLP	<	0.02 mg/l	08/23/07 11:39	WPS
Selenium, TCLP		0.038 mg/l	08/23/07 11:39	WPS
Silver, TCLP		0.0036 mg/l	08/23/07 11:39	WPS
SW-846 7470A R1.0				
Mercury, TCLP	<	0.0002 mg/l	08/23/07 11:20	WPS

Sample No: **07088355-5** Collect Date **08/21/07 10:00**
Client ID : **COPPER RECOVERY** Site : **STL** Locator :

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 1311				
Final pH		6.5	08/22/07 12:30	MEP,FM
Leachate Preparation			08/22/07 12:30	MEP,FM
SW-846 3010A				
Sample Preparation			08/23/07 08:00	JS
SW-846 6010 TCLP				
Arsenic, TCLP	<	0.03 mg/l	08/23/07 11:42	WPS
Barium, TCLP		0.75 mg/l	08/23/07 11:42	WPS
Cadmium, TCLP		0.11 mg/l	08/23/07 11:42	WPS
Chromium, TCLP	<	0.004 mg/l	08/23/07 11:42	WPS
Lead, TCLP	<	0.02 mg/l	08/23/07 11:42	WPS
Selenium, TCLP		0.058 mg/l	08/23/07 11:42	WPS
Silver, TCLP		0.0041 mg/l	08/23/07 11:42	WPS
SW-846 7470A R1.0				
Mercury, TCLP	<	0.0002 mg/l	08/23/07 11:20	WPS

PDC Laboratories, Inc.
3278 N. Highway 67 • Florissant, MO 63033
(314) 432-0550 • (800) 333-FAST (3278) • FAX (314) 432-4977

ACCREDITED IN ACCORDANCE WITH nelac

Laboratory Results

Big River Zinc
Rt. 3 & Monsanto Ave.

Sauget, IL 62201
Attn : Mr. Mike Altepeter

Date Received : 08/21/07 16:04
Report Date : 08/23/07
Customer # : 201097
P.O. Number : 34339
Facility :

Sample No: **07088355-6** Collect Date **08/21/07 10:30**
Client ID : **EIMCO BASEMENT WALL** Site : **STL** Locator :

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 1311				
Final pH		5.53	08/22/07 12:30	MEP,FM
Leachate Preparation			08/22/07 12:30	MEP,FM
SW-846 3010A				
Sample Preparation			08/23/07 08:00	JS
SW-846 6010 TCLP				
Arsenic, TCLP	<	0.03 mg/l	08/23/07 11:45	WPS
Barium, TCLP		0.42 mg/l	08/23/07 11:45	WPS
Cadmium, TCLP		5.2 mg/l	08/23/07 11:45	WPS
Chromium, TCLP		0.21 mg/l	08/23/07 11:45	WPS
Lead, TCLP	<	0.02 mg/l	08/23/07 11:45	WPS
Selenium, TCLP		0.021 mg/l	08/23/07 11:45	WPS
Silver, TCLP		0.0057 mg/l	08/23/07 11:45	WPS
SW-846 7470A R1.0				
Mercury, TCLP	<	0.0002 mg/l	08/23/07 11:20	WPS

Sample No: **07088355-7** Collect Date **08/21/07 11:00**
Client ID : **2ND STAGE PRESS FLOR** Site : **STL** Locator :

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 1311				
Final pH		6.46	08/22/07 12:30	MEP,FM
Leachate Preparation			08/22/07 12:30	MEP,FM
SW-846 3010A				
Sample Preparation			08/23/07 08:00	JS
SW-846 6010 TCLP				
Arsenic, TCLP	<	0.03 mg/l	08/23/07 11:49	WPS
Barium, TCLP		0.74 mg/l	08/23/07 11:49	WPS
Cadmium, TCLP		2 mg/l	08/23/07 11:49	WPS
Chromium, TCLP		0.0057 mg/l	08/23/07 11:49	WPS
Lead, TCLP	<	0.02 mg/l	08/23/07 11:49	WPS
Selenium, TCLP		0.067 mg/l	08/23/07 11:49	WPS
Silver, TCLP		0.005 mg/l	08/23/07 11:49	WPS
SW-846 7470A R1.0				
Mercury, TCLP	<	0.0002 mg/l	08/23/07 11:20	WPS

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(314) 432-0550 • (800) 333-FAST (3278) • FAX (314) 432-4977

ACCREDITED IN ACCORDANCE WITH

Laboratory Results

Big River Zinc
Rt. 3 & Monsanto Ave.

Sauget, IL 62201
Attn : Mr. Mike Altepeter

Date Received : 08/21/07 16:04
Report Date : 08/23/07
Customer # : 201097
P.O. Number : 34339
Facility :

ACCREDITATIONS

NELAC Accreditation for Wastewater, Hazardous and Solid Wastes Fields of Testing through IL EPA Lab No. 100253.

Certified by: Barbara G. Pandolfo
Barbara G. Pandolfo, Project Manager

PDC Laboratories, Inc. – St. Louis
3278 N. Highway 67 (Lindbergh)
Florissant, MO 63033
www.pdclab.com www.environmetrics.net

Phone (314) 432-0550 or (314) 921-4488
Fax (314) 432-4977 or (314) 921-4494

CHAIN OF CUSTODY RECORD

State where samples collected ______

(Instructions/Sample Acceptance Policy on Reverse)

ALL SHADED AREAS MUST BE COMPLETED BY CLIENT (PLEASE PRINT)

(1) CLIENT: Big River Zinc
ADDRESS: 2401 Mississippi Ave
CITY STATE ZIP: Sauget IL 62201
CONTACT PERSON: Mike Altender

PROJECT NUMBER: | P.O. NUMBER: | MEANS SHIPPED:
PHONE NUMBER: | FAX NUMBER: | EMAIL ADDRESS:
SAMPLER: R. Harper
SAMPLER'S SIGNATURE: [signature]

MATRIX TYPES: WW-WASTEWATER, DW-DRINKING WATER, GW-GROUND WATER, WWSL-SLUDGE, NAS-SOLID, LCHT-LEACHATE, NAL-NONAQUEOUS, SOIL-SOILS

(3) ANALYSIS REQUESTED: TCLP Metals

(4) (FOR LAB USE ONLY)
LOGIN # 07088355
LOGGED BY: HE
LAB PROJ. #
TEMPLATE:
PROJ. MGR.:

(2)

SAMPLE DESCRIPTION AS YOU WANT ON REPORT	DATE COLLECTED	TIME COLLECTED	SAMPLE TYPE GRAB	SAMPLE TYPE COMP	MATRIX TYPE	Bottle Count	TCLP Metals	REMARKS
Cadmium floor by Strontium Tanks	8/21/07	0810 HRS	✓		N/A	N/A	✓	Core Drilled
Floor by the old Eimco Filters	"	0830 HRS	✓				✓	"
First Stage Floor	"	0900 HRS	✓				✓	"
Leach Floor	"	0920 HRS	✓				✓	"
Copper Recovery	"	1000 HRS	✓				✓	"
Eimco Basement Wall	"	1030 HRS	✓				✓	"
Second Stage Press Floor	"	1100 HRS	✓				✓	"

Core Samples →

(5) TURNAROUND TIME (RUSH TAT IS SUBJECT TO PDC LABS APPROVAL AND SURCHARGE)
NORMAL (8-10 Bus. Days) RUSH (5 Bus. Days) Fastrak™ (3 Bus. Days) 1-2 Bus. Days Same Day
DATE DUE ______

RESULTS BY: E-MAIL FAX PHONE CALL PHONE/FAX# IF DIFFERENT FROM ABOVE

(6) The sample temperature will be measured upon receipt at the lab. By initialing this area, you request that the lab notify you, before proceeding with analysis, if the sample temperature is outside of the range of 0.1-6.0°C. By not initialing this area, you allow the lab to proceed with analytical testing regardless of the sample temperature. ______

(7)

RELINQUISHED BY: (SIGNATURE)	DATE	TIME	RECEIVED BY:	DATE	TIME
[signature]	8/21/07	12:19	Courtney Beard	8/21/07	12:20
Courtney Beard	8/21/07	1:36	Richard L. Koenig	8-21-07	1:36
Richard Koenig	8/21/07	3:10 PM	Heather Earhart	8/21/07	3:10

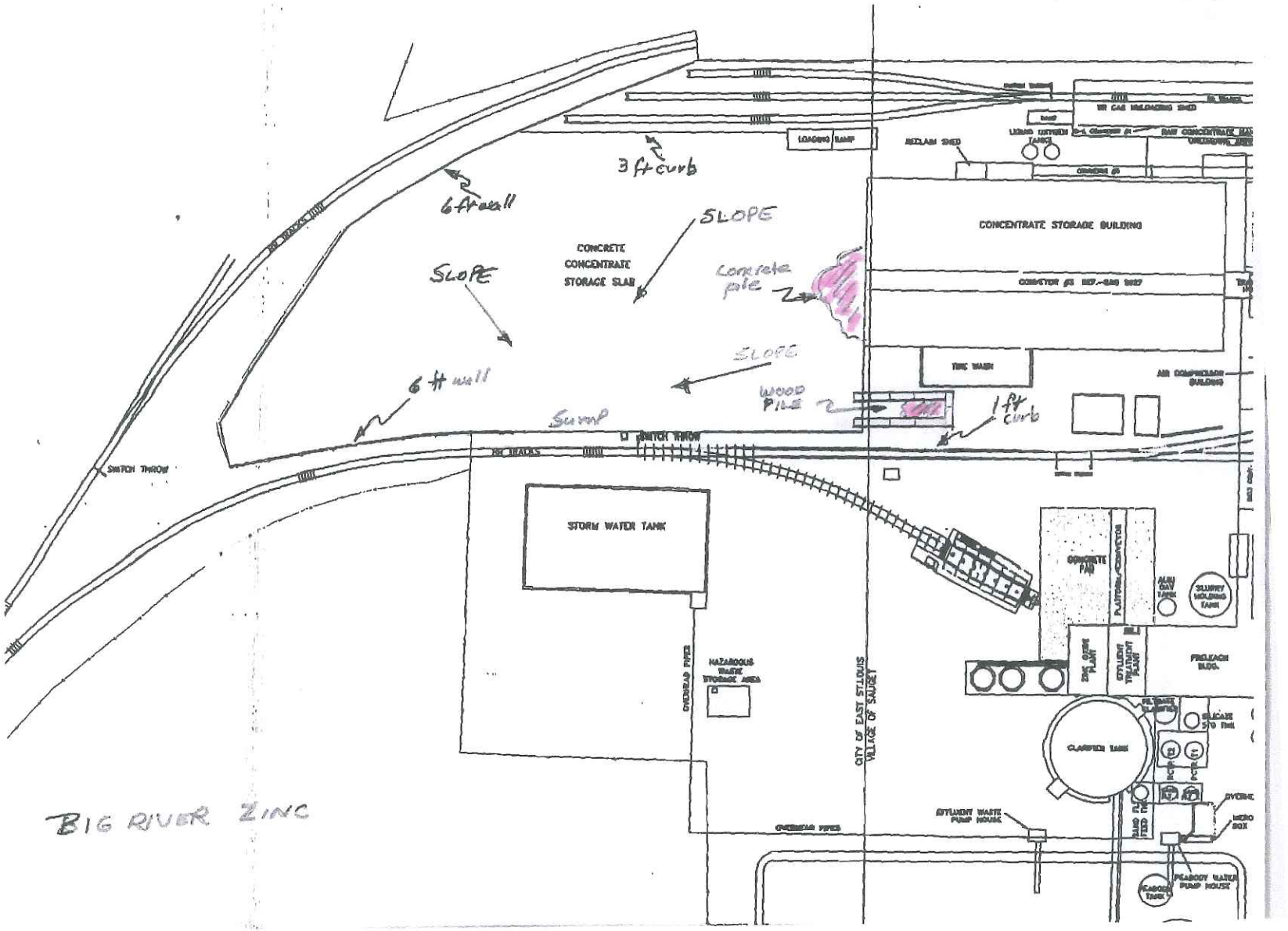
(8) COMMENTS: (FOR LAB USE ONLY)

SAMPLE TEMPERATURE UPON RECEIPT ______ °C
CHILL PROCESS STARTED PRIOR TO RECEIPT Y OR N
SAMPLES(S) RECEIVED ON ICE Y OR N
PROPER BOTTLES RECEIVED IN GOOD CONDITION Y OR N
BOTTLES FILLED WITH ADEQUATE VOLUME Y OR N
SAMPLES RECEIVED WITHIN HOLD TIME(S) (EXCLUDES TYPICAL FIELD PARAMETERS) Y OR N
DATE AND TME TAKEN FROM SAMPLE BOTTOM ______

Region V Request for Information from Big River Zinc Corporation Dated Jan 7, 2009

Request number 3

Concentrate Storage Pad



BIG RIVER ZINC

APPLICA[illegible] AND CERTIFICATE FOR PAYMENT — *AIA DOCUMENT G702* — PAGE OF [illegible] TWO PAGES

TO: River Zinc Corporation
2401 Mississippi Avenue
Sauget, IL 62201

APPLICATION NO: 1
PERIOD TO: 08/09/02

Distribution to:
[x] OWNER
[ ] ENGINEER
[ ] CONTRACTOR

FROM: BERCO Construction, Inc.
7008 B Godfrey Road
Godfrey, IL 62035

Purchase Order No. 42671 CONTRACT DATE: July 19, 2002

APPLICATION FOR PAYMENT

CHANGE ORDER SUMMARY	ADDITIONS	DEDUCTIONS
Change Orders approved in previous months by Owner		
Approved this Month		
Number Date		
1	$42,365.00	
2	$283.14	
3		$1,108.50
TOTALS	$41,539.64	
Net Change by Change Orders		

The undersigned Contractor certifies that to the best of the Contractors knowledge, information and belief the work covered by this Application for Payment has been completed in accordance with the Contract Documents, that all amounts have been paid by the Contractor for Work for which previous Certificates for Payment were issued and payments received from the Owner, and that current payment shown herein is now due.

CONTRACTOR: BERCO Construction, Inc.

BY: [signature] Date: 08/28/02
Richard E. Schuetz, President

Application is made for Payment, as shown below, in connection with the Contract Continuation Sheet, AIA Document G703, is attached.

1. ORIGINAL CONTRACT SUM	$17,566.00
2. Net change by Change Orders	$41,539.64
3. CONTRACT SUM TO DATE (Line 1 +/- 2)	$59,105.64
4. TOTAL COMPLETED & STORED TO DATE (Column G on G703)	$59,105.64
5. RETAINAGE:	
a. 0% Completed Work ($0.00) (Column D + E on G703)	
b. 0% of Stored Material ($0.00) (Colum F on G703)	
Total Retainage (Line 5a + 5b or Total in Column I of G703)	$0.00
6. TOTAL EARNED LESS RETAINAGE (Line 4 less Line 5 total)	$59,105.64
7. LESS PREVIOUS CERTIFICATES FOR PAYMENT (Line 6 from prior Certificate)	$0.00
8. CURRENT PAYMENT DUE	$59,105.64
9. BALANCE TO FINISH, PLUS RETAINAGE (Line 3 less Line 6)	$0.00

State of: Illinois County of: Jersey
Subscribed & sworn to before me on this day 08/28/02
Notary Public [signature]
My Commission expires: 6-12-04

OFFICIAL SEAL
JENNIFER L POGLAJEN
NOTARY PUBLIC STATE OF ILLINOIS
My Commission Expires 06-12-2004

ARCHITECT'S CERTIFICATE FOR PAYMENT

In accordance with the Contract Documents, based on on-site observations and the data comprising the above application, the Architect certified to the Owner that to the best of the Architect's knowledge, information and belief the work has progressed as indicated. The quality of work is in accordance with the Contract Documents, and the Subcontractor is entitled to payment of the Amount Certified.

ROF # 7101-5118 #30,000
94101-5119-#29105.64

AMOUNT CERTIFIED: $

(Attach explanation if amount certified differs from the amount applied for)

ARCHITECT:

BY: _____

This Certificate is not negotiable. The Amount Certified is payable only to the Contractor named herein. Issuance, payment and acceptance of payment are without prejudice to any rights of the Owner or Contractor under the Contract.

DRD 9/6/02 a1907

CONTINUATION SHEET

AIA DOCUMENT G703

Concentrate Storage Slab Repair

AIA Document G702, APPLICATION AND CERTIFICATE FOR PAYMENT, containing
Contractor's signed Certification is attached.
In tabulations below, amounts are stated to the nearest dollar
Use Column I on Contracts where variable retainage for line items may apply.

APPLICATION NUMBER: 1
APPLICATION DATE: 08/28/02
PERIOD TO: 08/28/02

A	B	C	D	E	F	G		H	I
ITEM NO	DESCRIPTION OF WORK	SCHEDULED VALUE	WORK COMPLETED		MATERIALS PRESENTLY STORED (NOT IN D OR E)	TOTAL COMPLETED & STORED TO DATE (D+E+F)	% G / C	BALANCE TO FINISH (C-G)	RETAINAGE 0%
			FROM PREVIOUS APPLICATION (D + E)	THIS PERIOD					
1	Slab Repairs - Demo/Replace	$17,566.00	0.00	$17,566.00	$0.00	$17,566.00	100.00%	$0.00	$0.00
2	C.O. #1 - Additional Repairs	$42,365.00	0.00	$42,365.00	$0.00	$42,365.00	100.00%	$0.00	$0.00
3	C.O. #2 - Explor. Exc. T/M	$283.14	0.00	$283.14	$0.00	$283.14	100.00%	$0.00	$0.00
4	C.O. #3 - Deduct 150 sq ft Repairs	($1,108.50)	0.00	($1,108.50)	$0.00	($1,108.50)	100.00%	$0.00	$0.00
	Total	**$59,105.64**	**$0.00**	**$59,105.64**	**$0.00**	**$59,105.64**		**$0.00**	**$0.00**

Note: Item No. 4 (C.O. 3) represents a deduct for concrete and reinforcing.
The demolition and backfill activities have been completed.

WAIVER OF LIEN
(Valid Upon Receipt of Payment)

STATE OF ILLINOIS
COUNTY OF MADISON

TO WHOM IT MAY CONCERN:

Whereas the undersigned has been employed by ..... Big River Zinc Corporation
2401 Mississippi Avenue
Sauget, IL 62201

To furnish for the premise known as ..... Concentrate Storage Slab Repair

The undersigned, for and in consideration of the dollar amount shown below and other goods and valuable consideration, the receipt of which is hereby acknowledged, do(es) hereby waive and release, under the mechanics lien statues of the state where the project premises are located, any and all lien or claim or right of lien on the above described premises and the improvements, fixtures, and appurtenances thereon, and on the monies or other considerations due or to become due from the Owner and on all other project related monies from whatever source, on account of labor, service, materials, fixtures or apparatus furnished by the undersigned for or in connection with the above described premises.

In addition, the undersigned being duly sworn and deposed warrants that: (1) all workers employed by it or its subcontractors on the project have been fully paid to the date of this waiver; (2) all vendors, suppliers or materialmen from whom the undersigned or its subcontractors have purchased materials used in the project have been paid for materials delivered, on or prior to the date of this waiver; (3) none of the aforementioned workers or material suppliers has any claim or demand or right of lien against the above described premises and improvements thereon; and (4) all statements contained herein are true and correct and that he makes this waiver in order to induce payment with full knowledge and intent that the Owner any any lenders or title insurers will rely thereon.

BERCO Construction, Inc.
7008-B Godfrey Road
P.O. Box 5134
Godfrey, Illinois 62035

PAYMENT AMOUNT:
$59,105.64
Pay Application # 1

Richard E. Schuetz, President

BERCO Construction, Inc.
P.O. BOX 5134
GODFREY, IL 62035

(618) 467-2440

Invoice: 25

Sold to

BIG RIVER ZINC
ROUTE 3 & MONSANTO
SAUGET, IL 62201

Ship to

BRZ22102/CONC. CONCEN. SLAB
SAUGET, ILLINOIS

Account	P.O. Num	Ship Via	Ship Date	Terms	Invoice Date	Page
BIGRIVER	42671			Net 15	08/28/2002	

TIME & MATERIAL WORK
EXPLORATORY EXCAVATION
CONCRETE CONCENTRATE SLAB REPAIR
BIG RIVER ZINC

Item	Quantity	Description	Unit Price	Extended Price
	0	AUGUST 20, 2002	0.00	0.00
	3	LABORER JM - FOLEY STRAIGHT TIME	47.19	141.57
	3	LABORER JM - KNUTT STRAIGHT TIME	47.19	141.57

Subtotal 283.14

Total $283.14

SUBCONTRACT: BERCO Construction, [illegible]

PROJECT NAME: Big River Zinc-BRZ22102-Conc. Slab

DATE: [illegible]

SHEET: [illegible]

ENTER PHASES BELOW

LABOR NAME	CRAFT	Phase 4000	Phase 9001	Phase	Phase	Phase	Phase	Phase	RATE S, T, D	TOTAL HOURS	COST RATE	TOTAL COST
E. Buckley	LABF	8							S	8	42.20	$337.60
D. Foley	LAB	5	3						S	8	42.20	$337.60
D. Knutt	LAB	5	3						S	8	42.20	$337.60
F. Dewerff	CMF	8							S	8	42.87	$342.96
F. Dewerff	CMF	0.5							T	0.5	64.31	$32.16
E. Buckley	LABF	.5							T	0	0.00	$0.00
D. Foley	LAB	.5							T	0	0.00	$0.00
									S	0	0.00	$0.00
									S	0	0.00	$0.00
									S	0	0.00	$0.00
									S	0	0.00	$0.00
TOTAL MANHOURS THIS PAGE ONLY		26.5	6.0	0.0	0.0	0.0	0.0	0.0	32.5	TOTAL LAB.$ THIS SHEET		$1,387.92
TOTAL MANHOURS SUPPL. SHEETS									0.0	TOTAL SUPPL. LABOR $		$0.00
TOTAL MANHOURS ALL SHEETS									32.5	TOTAL LABOR		$1,387.92

MATERIAL

DESCRIPTION	SUPPLIER	QTY	PH	U/M	TICKET #	UNIT PRICE	AMOUNT	MARK-UP	TOTAL COST
Concrete	Schwend's E-Mix	16		CY	See Att.	$0.00	$0.00	$0.00	$0.00
						$0.00	$0.00	$0.00	$0.00
						$0.00	$0.00	$0.00	$0.00
						$0.00	$0.00	$0.00	$0.00
						$0.00	$0.00	$0.00	$0.00
						$0.00	$0.00	$0.00	$0.00
						$0.00	$0.00	$0.00	$0.00
TOTAL MAT. THIS SHEET									$0.00
TOTAL SUPPL. SHEETS									$0.00
TOTAL MATERIAL									$0.00

EQUIPMENT RENTAL/DRAYAGE

DESCRIPTION	EQP #	Phase 4000	Phase 9001	Phase 0	Phase	Phase	Phase	Phase	TOTAL	RATE	MARK-UP	TOTAL COST
									0	$0.00		$0.00
									0	$0.00		$0.00
									0	$0.00		$0.00
									0	$0.00		$0.00
									0	$0.00		$0.00
									0	$0.00		$0.00
									0	$0.00		$0.00
									0	$0.00		$0.00
TOTAL EQUIP. THIS SHEET												$0.00
TOTAL SUPPL. SHEETS												$0.00
TOTAL EQUIPMENT												$0.00

GRAND TOTAL $1,387.92

[signature]
QUANTITY APPROVED BY CONTRACTOR

SUBCONTRACTOR CERTIFIES THAT THIS IS THE ESTIMATED COST EXPENDED FOR THE SUBJECT DATE

Region V Request for Information from Big River Zinc Corporation Dated Jan 7, 2009

Request number 3

Contingency Plan

RCRA CONTINGENCY PLAN
AND EMERGENCY RESPONSE PROCEDURES

BIG RIVER ZINC CORPORATION
SAUGET, ILLINOIS

TABLE OF CONTENTS

1.0 INTRODUCTION

This RCRA Contingency Plan and associated Emergency Response Procedures (ERP) have been prepared for the Big River Zinc Corporation (BRZ) facility in Sauget, Illinois, in compliance with the requirements outlined in the U.S. Environmental Protection Agency (USEPA) rules and regulations for the Resource Conservation and Recovery Act (RCRA) - Hazardous Waste 40 CFR Part 264. Specifically, this document contains the requirements set forth by RCRA regarding a facility's Contingency Plan and Emergency Procedures for the accidental release of hazardous waste (40 CFR Part 264, Subpart D).

This Plan will be updated if the plan fails in an emergency, the facility changes in a way that increases the potential for fires, explosions, or releases of hazardous waste, or there is a change in the emergency coordinators or emergency equipment lists.

2.0 DESCRIPTION OF FACILITY

Big River Zinc Corporation (BRZ), Sauget, Illinois is engaged in the production of zinc. Sulfuric acid, copper cake, lead/silver concentrate, copper precipitate, and cadmium oxide are sold as by-products. The manufacturing process begins with fluid bed roasting of zinc sulfide concentrates. Sulfur dioxide is produced during the roasting process and is used to create sulfuric acid. The impure zinc oxide from the roaster is treated in several stages with sulfuric acid to leach out metals such as zinc, copper, cobalt, and cadmium. These metals are recovered and are sold as by-products to other industries, as is the lead and silver contained in the insoluble lead concentrate recovered from the leaching steps. The zinc goes through several additional steps and is recovered from solution by an electrowinning process. The sheets are washed and fed into an electric induction-melting furnace. The zinc is then poured into a mold, cooled, and shipped to the customers.

The facility is located at Route 3 and Monsanto Ave., Sauget, Illinois (Figure 1). The facility has three production shifts. Facility personnel are on site 24 hours per day, 7 days per week. The facility property is oriented on a north-south axis and comprises 35.4 acres with approximately 60% of the property under roof or paved.

BRZ has one hazardous waste roll-off container which is located west of the cadmium building. Filters containing metals are disposed of in the roll-off container. The roll-off is emptied at least every 90 days.

3.0. EMERGENCY REPORTING PROCEDURES

At all times, there is at least one employee at the facility or individuals who can be contacted with the responsibility for coordinating all internal emergency response measures at the facility. As required by federal regulations, the Emergency Coordinator (EC), or his alternate, is thoroughly familiar with all aspects of the ERP, all operations and activities at the facility, and the location of appropriate facility records. The EC and alternates may be reached through the security department.

3.1 Implementation of the Emergency Response Plan

The decision as to which elements of this ERP are to be implemented is made by the primary or alternate EC following an assessment of the site conditions. The basis of the EC's decision is his assessment of the magnitude of the emergency. The EC is responsible for determining if the emergency presents an actual or possible threat to human health and the environment, or if the situation can be controlled by onsite personnel and resources.

Some types of emergencies that require full implementation of the ERP include:

- A fire that could spread off site;
- A fire that is too large to extinguish with a portable fire extinguisher;
- A spill or release of hazardous material that results in airborne constituents; and
- Uncontainable impacted runoff due to a large fire, spill or release of material.

3.2 Internal Notification Procedures

Personnel

Upon discovering a situation which may represent an emergency, plant personnel will:

a. Report the situation to a supervisor immediately or call security; and

b. Verbally warn other personnel if the situation is an immediate threat to safety.

Supervisor/Security

When notified of an emergency situation, the supervisor/security will:

a. Take necessary steps to prevent injury to personnel, damage to equipment, and any potential fire hazard; and

b. Contact the Emergency Coordinator.

Emergency Coordinator

The primary EC (or an alternate) will follow the procedures below in the event of a release, explosion, fire, or other emergency:

- Assess the situation and if warranted:

  Declare an emergency and notify all plant personnel with instructions by two-way radios. If there is a release, fire, or explosion which could threaten human health or environment outside the facility, the EC is to immediately declare an emergency.

  Notify security to call for police and/or fire department. The police or fire department have the responsibility for coordinating outside response efforts. Telephone numbers of emergency response agencies are located in Section 3.3. A two-way radio connection is also available in the security office for contacting the police and fire departments.

- Commit and direct activities of any and all resources available that are necessary to carry out the ERP. The EC will focus on measures to eliminate potential harm to human health and the environment.

Whenever there is a release, fire, or explosion, the EC will act without delay to identify the character, exact source, amount, and aerial extent of the released materials. This may be accomplished by observation or review of facility records, manifests, and, if necessary, by chemical analysis. The EC will inspect for possible hazards to human health or the environment, both direct and indirect. This assessment will consider onsite and offsite effects as required.

Throughout the emergency, the EC will take measures which are reasonable and necessary to ensure that fires and/or releases do not have an effect on any other substances at the facility.

3.3 Emergency Contact Phone List

Security	Ext. 110 (Internal Plant Phone) (618) 274-5000 ext. 110 (Outside Phone)
Primary Emergency Coordinator	
Mike Altepeter	(618) 274-5000 Ext.194 (office) (618)410-8021 (cell)

Alternate Emergency Coordinator

Anthony Thomas (618) 274-5000 Ext. 198 (office)
(618) 410-8020 (cell)

Federal National Response Center (800) 424-8802
(Release of Hazardous Substances)
USEPA Region V (312) 353-2000

State Illinois Emergency Management Agency (800) 782-7860

Local Emergency Response: Sauget Police, Fire, Ambulance 911

Local Emergency Planning Committee (LEPC) (618) 277-3012
Mr. Don Feher
Local Emergency Planning Committee
321 W. "F" Street
Belleville IL 62220-1193

Hospital
Memorial Hospital Emergency (618) 257-5840
Attn. Mr. Don Schneider
4500 Memorial Drive
Belleville, IL 62226

Contractor Support
Heritage Environmental (800) 388-3500
Attn: Mr. Dan Hans
1188 Pershall Road
Bellfountaine, MO 63137

Big River Zinc has discussed the contents of this plan, and has provided a copy of the plant to the Sauget Fire and Police Departments, the LEPC, Heritage Environmental and Memorial Hospital.

3.4 Evacuation Plan

The EC will assist the fire department in determining the need for evacuation of the area surrounding the plant. This assessment is based on the EC's knowledge of the hazardous materials involved, the site conditions, and the current weather conditions. The role of the EC in this situation is an advisory one, and the decision to evacuate an area is the responsibility of the appropriate agencies.

The EC and alternates are responsible for the plant-wide evacuations only. Designated evacuation routes for plant personnel are displayed on Figure 2. Communication of evacuation to employees is by two-way radios, alarms, intercom, and other personnel to insure that all employees are informed and evacuated. The fire alarms are tested monthly to ensure they are in proper working condition. If an evacuation is ordered, plant personnel shall discontinue operation of all equipment and evacuate the area as soon as possible. Evacuation routes are determined according to the plant area affected.

Upon receiving instruction by two-way radio or by activation of an audible warning device, supervisors are to instruct employees to leave the facility according to their predetermined exit routes. The employees are to go to the designated assembly point, west of the facility, in the employee parking lot. Once the plant is evacuated, the supervisor of each area takes a prompt and accurate account of all personnel to ensure that everyone is accounted for.

The fire department is responsible for evacuation plans within the surrounding area and for coordinating local resources, including the police department and hospitals to assist in the implementation of the evacuation plan.

The EC, in consultation with the fire department and other local agencies, as necessary, will decide when reoccupation of the facility is possible. Only after following all the post-emergency procedures (see Section 5.0) can the facility resume operation.

3.5 Emergency Response Procedures

3.5.1 Fire and Explosion Emergency Response

An employee, upon detecting a fire or imminent explosion in the facility, will initiate the following actions:

- Use hand-held fire extinguishers to control or extinguish the fire if the fire is in an initial, controllable stage and no potential for imminent explosion exists.
- Contact his supervisor or security. Security will locate the EC and inform him of the fire and its location. Activate the alarm system. The supervisor will begin response preparation.
- Upon receiving available information, the EC or security will call the fire department to inform them of the situation and receive instruction.

After following the steps outlined above for emergency situations, the EC or, in his absence, the supervisor, must do the following:

- Take action to shut off electrical power and any gas in the vicinity of the fire location. Stop process and/or operations that may interfere with the emergency response actions;
- Take action, if necessary and safe to do so, to place absorbent materials around drains to prevent spilled hazardous waste from entering the sewer system;
- Notify all unauthorized personnel to vacate the area per evacuation plans; and
- Follow any instruction given by the fire department.

In addition, the EC must also:

- Note the current weather conditions and estimate the current wind direction and speed;
- Identify the character, source, amount, and aerial extent of any released hazardous materials by observation and review of facility records, manifests, and, if necessary, by chemical analysis; and
- Determine if the situation necessitates complete evacuation of the plant site. Furthermore, the EC will assist the Fire Department in their decision to evacuate the surrounding area.

If the situation meets the criteria for full implementation, at the first opportunity, the EC shall report the emergency to the National Response Center **(800-424-8802)** and the Illinois Emergency Management Agency **(800-782-7860)**. This verbal report includes:

- Name, address, and telephone number of the reporter;
- Name and address of the facility;
- Time and type of incident;
- Name and reportable quantity of material involved to the extent known;
- Extent of injuries, if any; and
- Possible hazards offsite to human health and the environment.

3.5.2 Spill Emergency Response

Any employee discovering a hazardous waste spill is to immediately notify his supervisor or security. Security will notify the EC or alternate. The EC will assess the situation and act as follows:

- Clear the area of unauthorized personnel. Stop process and/or operations that may interfere with the emergency response;
- Identify the source or cause of the release material and obtain a Material Safety Data Sheet(s) (MSDS). Use MSDS information to guide response and determine personal protective equipment (PPE) required;
- Direct trained personnel to don the appropriate PPE, as used in normal job duties, and re-containerize the spilled material;
- Alert local authorities if material may reach outside facility property;
- Rope off and/or barricade the area to prevent entry of unauthorized personnel;
- Take measures to contain the spill;
- Direct cleanup so that all hazardous materials are placed in properly labeled containers;
- Ensure that spill material, water, and adsorbents are placed in Department of Transportation (DOT) approved containers for ultimate disposal; and
- Insure that no incompatible wastes are stored within the spill area until cleanup is complete.

4.0 RELEASE REPORTING REQUIREMENTS

4.1 General

In the event of external release of a hazardous material, the procedures outlined in Section 3.0 will be followed. Prior to contacting state and local agencies, the EC will gather as much information about the incident as quickly as possible. The concerned agencies will then be contacted with initial information. The appropriate agencies will be kept informed of any new, additional, or changed information regarding the incident.

4.2 Release of RCRA Hazardous Waste

In case of a fire, explosion, or release of hazardous waste (equal to or greater than the reportable quantity for the material), as defined under RCRA (40 CFR, Section 261) which could threaten human health or the environment outside the facility, concerned agencies will be contacted as soon as possible by the EC. If the evacuation of surrounding areas may be required, local emergency response teams will be alerted. The following agencies will be contacted by the EC:

Federal	National Response Center	(800) 424-8802
	USEPA Region V	(312) 353-2000
State	Illinois Emergency Management Agency	(800) 782-7860
Local	Sauget Fire, Police, Ambulance	911
	Mr. Don Feher Local Emergency Planning Committee (LEPC) 321 W. "F" Street Belleville, IL 62220-1193	(618) 277-3012
Contractor Support:		
	Heritage Environmental Attn. Mr. Dan Hans 1188 Pershall Road Bellfountaine, MO 63137	(800) 377-2440

5.0 POST-EMERGENCY PROCEDURES

When the emergency is contained, and a threat to human health and the environment no longer exists, the EC will take the following post-emergency actions:

- Decontamination/cleanup;
- Waste management;
- Post-emergency reporting; and
- Post-emergency assessment.

5.1 Decontamination/Cleanup

All of the equipment used in the emergency response procedures will be either decontaminated or properly containerized for disposal. Any non-emergency response equipment, such as materials or machinery, also affected by the emergency response will be decontaminated or disposed. The EC is responsible for arranging immediate replacement of any spent emergency response materials.

5.2 Waste Management

Waste residual materials, along with emergency response equipment needing disposal, will be collected and containerized in accordance with applicable regulations governing the management of such materials. Once all hazardous material is properly containerized, storage and disposal will be conducted according to applicable regulations.

5.3 Post-Emergency Reporting

The EC is responsible for ensuring the preparation and submittal of all required reports. A release, fire or explosion requires a written report to the USEPA Region V within 15 days of the event and the IEPA upon request only. The report will include:

- Name, address, and telephone number of the facility;
- USEPA identification number for the site;
- Date, time, and type of incident (e.g., fire, spill, etc.);
- Name and quantity of material(s) involved;
- Extent of injuries, if any;

- Assessment of any actual or potential hazards to human health or the environment;
- Procedures followed to reduce and remove released materials;
- Estimated quantity and disposition of the recovered material that resulted from the incident;
- Corrective measures taken;
- Whether an evacuation was required; and
- Name of individuals who have also been contacted or notified.

5.4 Post-Emergency Assessment

After the emergency episode, the EC will determine the causes of the emergency and analyze the effectiveness of emergency response procedures. The ERP will be modified if it is determined that procedures are inadequate or ineffective. If equipment capabilities are found unacceptable, necessary improvements will be made.

6.0 EMERGENCY EQUIPMENT

6.1 Communication Systems

Four different communication systems are available in the case of an emergency. They are described below.

Type	Description	Inspection Required
Two-Way Radios	The base station for the two-way radios is located in the main Security Office at the main gate house. Six two-way radios are located in the security department. Each of the four departments has a minimum of two radios which are normally carried by the supervisors. Many of the operators also have two-way radios. Fourteen radios are assigned to maintenance supervisors and the "rotating shift" electrician and mechanic. Two way radio communications with the police and fire departments of Sauget is available to security. A weather monitor is available 24-hours per day in case of a weather emergency.	Radios are in use daily so any problems with the system or individual radios would be detected immediately.
Telephones	There are three lines into the Security Office. Telephones are located in all supervisors offices, all control rooms, all administrative offices, and in various maintenance areas. Inner plant phones do not have access to outside lines so security must be called in case of emergency.	Telephones are in use daily so any problems would be detected immediately.
Paging System	There are 20 in-plant pagers carried by superintendents, general department supervisors, engineers, maintenance supervisors, and other supervisors for communication in the immediate plant area.	The paging system is in use daily so any problems would be detected immediately.
Message Center Operations	A continuing liaison can be maintained through the paging units and the Security Office for needed information by using the pager and telephone communications. However, emergency communications would generally be handled through the two way radios for faster response time.	N/A

6.2 Fire Equipment

Fire response equipment is located throughout the facility. This includes sprinkler systems, hand held fire extinguishers, and fire equipment boxes.

A smoke detection system is located in the computer room on the bottom floor of the administrative building and in the Safety Office. These systems sound in the main security office when activated. Five automatic deluge sprinkler systems are located throughout the plant. These systems and the twelve fire hydrants are supplied with water under pressure through the fire protection pump. An alarm siren and warning light are located on the outside of the building to alert personnel that the system is in use. The sprinkler systems are checked once a month by the maintenance department.

A list of the location and contents of the hand held fire extinguishers is located in Table 1 of Appendix B. The extinguishers are inspected by the department supervisors on a weekly basis. Documented inspections of the fire extinguishers are located in the safety department. In other areas, a designated person inspects the extinguishers on a monthly basis.

There are seven fire equipment boxes located throughout the facility. A list of these locations and contents of the boxes are provided in Table 2 of Appendix B. The boxes are inspected on a monthly basis by the security department.

6.3 Personnel Protective Equipment

In case of a release, fire, or explosion, goggles, face shields, respiratory protection, full body acid suits, and barrier cream are available from the Safety Department. Rubber dielectric boots, heavy duty rubber gloves, neoprene gloves, vinyl and latex gloves, and Tyvek disposable clothing are available from the store room.

6.4 First Aid

Stretchers are available in the foreman's office of every department. Safety showers are located at various locations in each department. Stokes basket and confined space rescue equipment are stored in the respirator room.

6.5 Spill Response Kits

Spill response kits containing appropriate tools and sorbent materials are located throughout the facility. A list of the spill kits and their locations are presented in Table 3 of Appendix B.

7.0 Training

The details of the training program for personnel involved in contingencies involving hazardous waste will be kept in the training department. As a minimum the program will document:

a. The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job.
b. A written job description for each position described above.
c. A written description of the type and amount of both introductory and continuing training that will be given to each person described above.
d. Training records detailing training given will be kept for at least three years from the date the employee last worked for the company.

APPENDIX A

FACILITY SITE DIAGRAMS

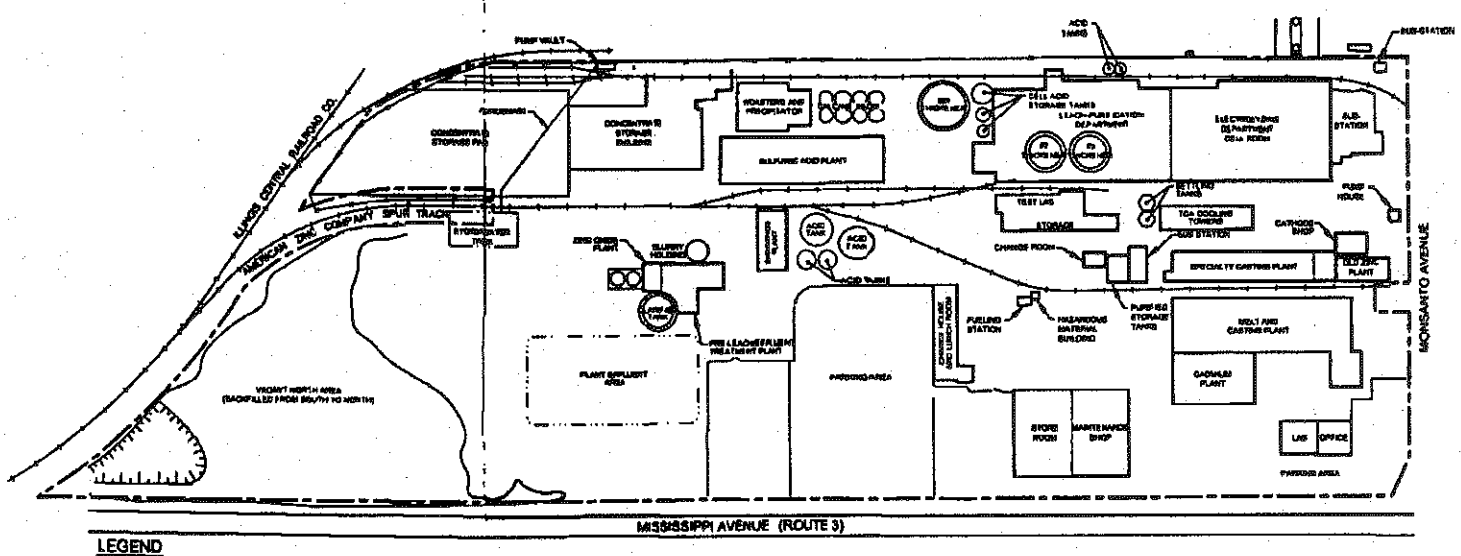


figure 1.2
SITE PLAN
SITE INVESTIGATION REPORT
BIG RIVER ZINC SITE
Sauget, Illinois

17109-00(004)GN-WA002 APR 07/2003

APPENDIX B

EQUIPMENT TABLES

APPENDIX B

EQUIPMENT TABLES

Table 2
Location and Content of Fire Equipment Boxes
Big River Zinc Corporation
Sauget, Illinois

Box Number	Location
A	South of main Casting Dept. - East of the South Contracting Gate
B	South of the Vehicle Shop along the West fence line
C	East of Cellroom along East fence line
D	East of Leach/Purification along East fence line
E	East of the Specialty Casting Building - West of Cellroom Unit #3
F	At the Oil House
G	Northwest of the Acid Plant Converter, by the railroad tracks

Contents of Fire Equipment Boxes

QUANTITY	ITEM	DESCRIPTION/USE
One	1 1/2 in. Nozzle	Combination, Adjusts to fog or straight stream
One	Reducer	To reduce hydrant outlet to the fire hose (2 1/2 in. down to 1 1/2 in.)
Two	Universal Spanner Wrenches	Cast aluminum 'C' shaped wrench. Use to tighten reducer to hydrant and to connect fire hoses.
One	Hydrant Wrench	Adjustable combination hydrant and spanner wrench to be used to open the hydrant by turning the top post.
Three	Fire Hoses	50 foot sections of 1 1/2 in. industrial strength fire hose
One	Axe	Wood handle fireman axe

Table 3
Spill Response Kit Locations and Contents
Big River Zinc Corporation
Sauget, Illinois

Spill Kit #	Name of SPCC Area	Location Description	Contents Code
1	Drum Storage Area # 2	Roaster Mechanics area inside of building on the south outer wall	1
2	#5 Substation-pad mounted transformer	Inside doorway, SE corner of skimmings plant	1
3	Waste Oil # 2	Outside the NW corner of the oil house	1
4	Diesel & Gasoline dispensing area	Above ground tanks, located west of RR tracks and S of cafeteria	1
5	Waste Oil # 1	Outside of building at the SW corner of the vehicle shop	1
6	Substation # 13A & 13B Pad mounted transformer	Substation located N of special casting & S of the purified storage tanks	1
7	# 4 Substation transformer	Inside E wall of the special casting bldg. N of the T-metal furnace	1
8	Substation # 6, 6A & 6B, Pad mounted transformer	S end of the main casting bldg. Inside the fenced area of the transformer yard	1
9	Substation # 11, Pad mounted transformer	S of cellroom unit # 3	1
10	Satellite Kerosene storage tank (winter only)	Outside SE corner of the Quonset storage	1
11	Substation # 1, Pad mounted transformer	Fenced transformer area, south end of cellroom	1
12	Substation # 2, Pad mounted transformer	SE corner of fenced transformer yard, S end of cellroom	1
13	Substation # 9, Pad mounted transformer	E side of ground level L/P, south of residue loading	1
14	Hazardous waste storage	N of pre-leach bldg. W of sludge pad	2

Contents Code:	1	2
	6 ea. 3" X 10' socks	2 ea. Long Handle Shovels
	4 ea. Absorbent pillows	2 ea. Push brooms
	75 ea. Absorbent mats	1 ea. 20 lb. CO Fire extinguisher
	10 ea. Disposable Bags/ties	1 ea. 15 lb. CO Fire extinguisher

Table 3
Fire Extinguisher Locations
Big River Zinc Corporation
Sauget, Illinois

DEPARTMENT	LOCATION	Location 2	BRZ #	B/C UNIT	B/C SITE	TYPE
Admin Bldg	SE Entry			3ZHFC	3ZHFD	20 lb ABC DRY CHEM
Admin Bldg	O/S Accounting			3ZHFR	3ZHFS	20 lb ABC DRY CHEM Cart-Op
Admin bldg	Sample Room			3ZHGO	3ZHG1	20 lb BC DRY CHEM Cart-OP
Admin Bldg	Lobby			3ZHFF	3ZHFG	5 lb ABC DRY CHEM
Admin Bldg	East Hallway	By Judy Tilk's office				
Admin Bldg	Basement Break room			3ZHFW	3ZHFX	5 lb ABC DRY CHEM Cart-OP
Admin Bldg	Lab 1 East			3ZHG2	3ZHG3	5 lb ABC DRY CHEM Cart-Op
Admin Bldg	Lab 2 East			3ZHG4	3ZHG5	5 lb ABC DRY CHEM Cart-Op
Admin Bldg	Computer Room			3ZHFH	3ZHFJ	17 lb Halon 1211
Admin Bldg	Computer Room			3ZHFK	3ZHFL	17 lb Halon 1211
Admin Bldg	Computer Room			3ZHFM	3ZHFN	17 lb Halon 1211
Admin Bldg	Computer Room			3ZHFP	3ZHFQ	17 lb Halon 1211
Admin Bldng	Mail Room			3ZHFT	3ZHFV	15 lb Carbon Dioxide
Admin Bldng	Lab 1 West		Q41	3ZHFY	3ZHFZ	15 lb Carbon Dioxide
Casting	@ Furnace	Under Baghouse	C7	3ZHGJ	3ZHGK	10 lb Carbon Dioxide
Casting	Skimming - Platform	Skimmings Downstairs	C33	3ZHF7	3ZHF8	15 lb Carbon Dioxide
Casting	Skimming- Platform	Skimmings Upstairs	C34	3ZHF9	3ZHFB	15 lb Carbon Dioxide
Casting	Electric Room 1	Zn Dust MCC North	C11	3ZHGX	3ZHGY	15 lb Carbon Dioxide
Casting	Electric Room 2	Zn Dust MCC West	C12	3ZHGZ	3ZHHO	15 lb Carbon Dioxide
Casting	Ship Office	Outside foremans office ?		3ZHG6	3ZHG7	20 lb Carbon Dioxide
Casting	Electric Room	MCC North	C9	3ZHGN	3ZHGP	20 lb Carbon Dioxide
Casting	Cadmium	Cd West Basement Wall	C31	3ZHHC	3ZHHD	20 lb Carbon Dioxide
Casting	East Building Platform	Die Cast Up	C24	3ZHJ2	3ZHJ3	20 lb Carbon Dioxide
Casting	Back Dr E maint	West Wall		3ZHJD	3ZHJF	20 lb Carbon Dioxide
Casting	Center Fl	Cathode Floor	C10	3ZHGV	3ZHGW	10 lb ABC Dry Chem
Casting	East Building North Door	Die cast North end	C26	3ZHHT	3ZHHV	20 lb ABC DRY CHEM
Casting	New Sub Station	East	C36	3ZHMR	3ZHMS	20 lb ABC DRY CHEM
Casting	Ship Office	Foremans Office	C1	3ZHG8	3ZHG9	20 lb ABC DRY CHEM Cart-Op
Casting	Ship Office	O/S Metal Analyzing room	C2	3ZHGB	3ZHGC	20 lb ABC DRY CHEM Cart-OP
Casting	By Scale	East Middle	C3	3ZHGD	3ZHGF	20 lb ABC DRY CHEM Cart-Op
Casting	SE corner	South East Corner	C6	3ZHGG	3ZHGH	20 lb ABC DRY CHEM Cart-Op
Casting	West wall	West Middle	C5	3ZHGQ	3ZHGR	20 lb ABC DRY CHEM Cart-Op
Casting	North end	M/L holding Conveyor	C4	3ZHGS	3ZHGT	20 lb ABC DRY CHEM Cart-Op
Casting	Dust Hopper	Zn Dust East wall	C13	3ZHH7	3ZHH8	20 lb ABC DRY CHEM Cart-Op
Casting	Cadmium	Cd south basement wall	C30	3ZHHF	3ZHHG	20 lb ABC DRY CHEM Cart-Op

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Big River Zinc Corporation
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DEPARTMENT	LOCATION	Location 2	BRZ #	B/C UNIT	B/C SITE	TYPE
Casting	Cadmium	Cd oxide room basement	C29	3ZHHH	3ZHHJ	20 lb ABC DRY CHEM Cart-Op
Casting	Cadmium office	Cd office	C28	3ZHHK	3ZHHL	20 lb ABC DRY CHEM Cart-Op
Casting	By W Ramp	Cd west door	C32	3ZHHM	3ZHHN	20 lb ABC DRY CHEM Cart-Op
Casting	Center Wall	Zn Dust Baghoust	C17	3ZHHP	3ZHHQ	20 Lb ABC DRY CHEM Cart-Op
Casting	East Bldg Center Hoist	T Metal pin press	C35	3ZHHW	3ZHHX	20 lb ABC DRY CHEM Cart-Op
Casting	East Bldg S Dr	Die Cast down	C23	3ZHJO	3ZHJ1	20 lb ABC DRY CHEM Cart-Op
Casting	Maintenance Warehouse	Old Zn dust 2nd floor E	C20	3ZHJG	3ZHJH	20 lb ABC DRY CHEM Cart-Op
Casting	Maintenance 2nd Level	Old Zn dust 2nd floor N	C21	3ZHJL	3ZHJM	20 lb ABC DRY CHEM Cart-Op
Casting	3rd Level Maintenance	Old Zn Dust 3rd floor	C22	3ZHJN	3ZHJP	20 lb BC DRY CHEM Cart-Op
Casting	Maintenance Whse	Old Zn dust north wall	C19	3ZHJQ	3ZHJR	20 lb BC DRY CHEM Cart -Op
Casting	Maintenance Front Door	Old Zn dust East wall	C18	3ZHJS	3ZHJT	20 lb BC DRY CHEM Cart-Op
Casting	Dust Hopper	Zn dust North Blowbin	C14	3ZHH1	3ZHH2	30 lb Class D Cart-Op
Casting	Dust Hopper	Zn dust South blowbin	C15	3ZHH3	3ZHH4	30 lb Class D Cart-Op
Casting	Dust Hopper	Zn dust basement	C16	3ZHH5	3ZHH6	30 lb Class D Cart-Op
Casting	Dust Hopper	Zn dust baghouse	C17	3ZHH9	3ZHHB	30 lb Class D Cart-Op
Casting	Electric room	MCC South	C8	3ZHGL	3ZHGM	20 lb Carbon Dioxide
Casting	New Sub Station	West	C37	3ZHMT	3ZHMV	20 lb ABC DRY CHEM
Casting	East Bldg W Wall	Die Cast west wall	C25	3ZHHY	3ZHHZ	20 lb ABC DRY CHEM Cart-Op
Cellroom	Unit 1 Substation	1st Floor, East of Store rm	M5	3ZHM3	3ZHM4	15 lb Carbon Dioxide
Cellroom	Unit 1 Substation	1st Floor North wall -Center		3ZHM5	3ZHM6	15 lb Carbon Dioxide
Cellroom	Unit 1 Substation	1st Floor North of Stairs		3ZHM7	3ZHM8	15 lb Carbon Dioxide
Cellroom	Unit 1 Substation	2nd Floor Top of Stairs		3ZHM9	3ZHMB	15 lb Carbon Dioxide
Cellroom	Unit 1 Substation	Electrician office - West side		3ZHMC	3ZHMD	15 lb Carbon Dioxide
Cellroom	Sub Station #8	By South Door		3ZHMP	3ZHMQ	20 lb Carbon Dioxide
Cellroom	Unit 1 Substation	2nd floof center, wheel unit		3ZHMF	3ZHMG	50 lb Carbon Dioxide
Cellroom	Unit 1 Substation	2nd floor North, wheel unit		3ZHMH	3ZHMJ	50 lb Carbon Dioxide
Cellroom	Unit 1 Substation	1st floor by drill press		3ZHM1	3ZHM2	20 lb ABC DRY CHEM cart-Op
Cellroom	Unit 1 Substation	2nd floor by west door		3ZHMK	3ZHML	20 lb ABC DRY CHEM Cart-OP
Cellroom	Unit 1 Substation	2nd floor, South center wall		3ZHMM	3ZHMN	20 lb ABC DRY CHEM Cart-Op
Cellroom	Elect room	MCC Below Office	Y7	3ZHLL	3ZHLM	10 lb Carbon Dioxide
Cellroom	Sub Station 2	East wall - North	M17	3ZHLV	3ZHLW	10 lb Carbon Dioxide
Cellroom	Sub Station 2	East Wall - Center	M18	3ZHLX	3ZHLY	10 lb Carbon Dioxide
Cellroom	Sub Station 2	East Wall - South	M19	3ZHLZ	3ZHMO	10 lb Carbon Dioxide
Cellroom	Prod Area	North - By steps		3ZHLS	3ZHLT	15 lb Carbon Dioxide
Cellroom	Sub 13	Outside East Door		3ZHJV	3ZHJW	20 lb Carbon Dioxide

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Big River Zinc Corporation
Sauget, Illinois

DEPARTMENT	LOCATION	Location 2	BRZ #	B/C UNIT	B/C SITE	TYPE
Cellroom	Control room	W. Foremans Office	T6	3ZHLP	3ZHLN	20 lb ABC DRY CHEM
Cellroom	TCA Towers Ground N	Column	T14	3ZHLO	3ZHL1	20 lb ABC DRY CHEM Cart-Op
Cellroom	TCA Towers Ground N	By catwalk over hot sump	T14	3ZHL2	3ZHL3	20 lb ABC DRY CHEM Cart-Op
Cellroom	TCA Towers SW	Fan Floor		3ZHL4	3ZHL5	20 lb ABC DRY CHEM Cart-Op
Cellroom	TCA Towers NW	Fan Floor		3ZHL6	3ZHL7	20 lb ABC DRY CHEM Cart-Op
Cellroom	South	S. Basement	T8	3ZHLD	3ZHLF	20 lb ABC DRY CHEM Cart-Op
Cellroom	Center	Center Basement West	T9	3ZHLG	3ZHLH	20 lb ABC DRY CHEM Cart-Op
Cellroom	Center	Basement West		3ZHLJ	3ZHLK	20 lb ABC DRY CHEM Cart-Op
Cellroom	Control room	S. Cellroom	T3	3ZHLQ	3ZHLR	20 lb ABC DRY CHEM Cart-Op
Cellroom	Head Tankman Shack	Outside East Door	T12	3ZHQZ	3ZHRO	20 lb ABC DRY CHEM Cart-Op
Cellroom	TCA Shack	By Water fountain		3ZHL8	3ZHL9	5 lb ABC DRY CHEM Cart-Op
Cellroom	Unit # 3	Stripping floor - North		3FZSL	3FZSM	20 lb ABC DRY CHEM
Cellroom	Unit # 3	Stripping floor - Mid		3FZSK	3FZSJ	20 lb ABC DRY CHEM
Cellroom	Unit # 3	Stripping floor- South		3FZSH	3FZSG	20 lb ABC DRY CHEM
Cellroom	Unit # 3	Basement - South		3FZSQ	3FZSR	20 lb ABC DRY CHEM
Cellroom	Unit # 3	Basement - North		3FZSS	3FZST	20 lb ABC DRY CHEM
Cellroom	Sub # 11	West wall		3FZS4	3FZS5	20 lb Carbon Dioxide
Cellroom	Sub # 11	East wall		3FZSB	3FZSC	20 lb Carbon Dioxide
Cellroom	Sub # 11	North wall -West		3FZS6	3FZS7	20 lb Carbon Dioxide
Cellroom	Sub # 11	North wall - East		3FZS8	3FZS9	20 lb Carbon Dioxide
Cellroom	Clean-up cells	Southwest corner		3FZSN	3FZSP	20 lb ABC DRY CHEM
Cellroom	Gypsum removal towers	Top- Northeast corner		3ZHQX	3ZHQY	20 lb ABC DRY CHEM
Cellroom	North Basement	NE of high press. pump	L17	3ZHPK	3ZHPL	20 lb ABC DRY CHEM cart-Op
Engineering	Copy room	On floor by door		3ZHNN	3ZHNP	20 lb ABC DRY CHEM
Leach Purification	Weak Acid Leach	By # 1 tank, North by door		3ZHP5	3ZHP6	20 lb ABC DRY CHEM
Leach/Purification	MCC by paper press area	Inside MCC (Blueroom)		3ZHQS	3ZHQT	10 lb Carbon Dioxide
Leach/Purification	# 9 Substation	North End		3ZHP7	3ZHP8	15 lb Carbon Dioxide
Leach/Purification	# 9 Substation	South End	L31	3ZHP9	3ZHPB	15 lb Carbon Dioxide
Leach/Purification	O/S Maint			3ZHPH	3ZHPJ	15 lb Carbon Dioxide
Leach/Purification	1st Stage	Midway by air drier		3ZHQ0	3ZHQ1	15 lb Carbon Dioxide
Leach/Purification	Leach	South of #3 Leach Tank		3ZHPT	3ZHPV	20 lb Carbon Dioxide
Leach/Purification	2nd Stage	West pole by #1 Tank		3ZHQ4	3ZHQ5	20 lb Carbon Dioxide
Leach/Purification	2nd Stage	East of Presses		3ZHQ8	3ZHQ9	20 lb Carbon Dioxide
Leach/Purification	Eimco Floor	West of #3 Eimco	L1	3ZHQ6	3ZHQ7	20 lb ABC DRY CHEM

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Big River Zinc Corporation
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DEPARTMENT	LOCATION	Location 2	BRZ #	B/C UNIT	B/C SITE	TYPE
Leach/Purification	Residue	North of Floc Make-up tank		3ZHQL	3ZHQM	20 lb ABC DRY CHEM
Leach/Purification	1st Stage new presses	Southeast corner		3ZHQN	3ZHQP	20 lb ABC DRY CHEM
Leach/Purification	ZSM	MCC Blower room		3ZHPC	3ZHPD	20 lb ABC DRY CHEM Cart-Op
Leach/Purification	ZSM	South pole by locker	L32	3ZHPM	3ZHPN	20 lb ABC DRY CHEM cart-op
Leach/Purification	ZSM	Cd precip tanks by steps		3ZHPP	3ZHPQ	20 lb ABC DRY CHEM Cart-Op
Leach/Purification	Leach	South of # 1 Leach Tank		3ZHPR	3ZHPS	20 lb ABC DRY CHEM cart-op
Leach/Purification	Leach	N. Calcine bin top	L07	3ZHPW	3ZHPX	20 lb ABC DRY CHEM cart-op
Leach/Purification	1st Stage	1st Stage North	L8	3ZHPY	3ZHPZ	20 lb ABC DRY CHEM cart-op
Leach/Purification	1st Stage	1st Stage South	L09	3ZHQ2	3ZHQ3	20 lb ABC DRY CHEM cart-op
Leach/Purification	Residue MCC	Outside	L23	3ZHQB	3ZHQC	20 lb ABC DRY CHEM Cart-op
Leach/Purification	Residue	Control room	L24	3ZHQD	3ZHQF	20 lb ABC DRY CHEM Cart-Op
Leach/Purification	Residue Room	South Residue press		3ZHQG	3ZHQH	20 lb ABC DRY CHEM cart-op
Leach/Purification	Residue Room	North press control panel		3ZHQJ	3ZHQK	20 lb ABC DRY CHEM Cart-Op
Leach/Purification	Foremans Office	South wall	L14	3ZHQQ	3ZHQR	20 lb ABC DRY CHEM cart-Op
Leach/Purification	Press paper area	South	L15	3ZHQV	3ZHQW	20 lb ABC DRY CHEM Cart-OP
Leach/Purification	Eimco Sump	East of deep leg pit	L18	3FZRV	3FZRT	
Leach/Purification	Southwest Leach-down	S.W. of Leach tanks	L2	3FZRY	3FZRZ	
Leach/Purification	Inside North door	North of # 3 Leach Tank	L3	3FZSO		
Leach/Purification	East of Classifier/Ball mill	On pole by ramp	L4	3FZRW		
Maintenance	Leach/Purification	Northwest of Maint. Shack		3ZHPF	3ZHPG	20 lb ABC DRY CHEM
Maintenance	Casting-Near back door	Mounted to work bench		3ZHJB	3ZHJC	20 lb ABC DRY CHEM Cart-Op
Maintenance	Cadmium	Maintenance shop		3ZHHR	3ZHHS	5 lb ABC DRY CHEM Cart-OP
Maintenance	Cellroom Maintenance area	Northwest of welding booth		3ZHLB	3ZHLC	20 lb ABC DRY CHEM Cart-Op
Maintenance	Gas pumps	west side		3ZHKP	3ZHKQ	20 lb ABC DRY CHEM Cart-Op
Maintenance	Main Compressor Room	Near West door		3ZHK5	3ZHK6	20 lb Carbon Dioxide
Maintenance	Main Compressor Room	Between #7 & 8 Air Control		3ZHK3	3ZHK4	20 lb ABC DRY CHEM Cart-Op
Maintenance	Oil house	North side		3ZHK7	3ZHK8	20 lb ABC DRY CHEM
Maintenance	Oil house	South side		3ZHK9	3ZHKB	20 lb ABC DRY CHEM Cart-Op
Maintenance	Quanset Hut	Front door		3ZHJ4	3ZHJ5	20 lb ABC DRY CHEM Cart-Op
Maintenance	Quanset hut	Center		3ZHJ6	3ZHJ7	20 lb ABC DRY CHEM Cart-Op
Maintenance	Quanset hut	Back door		3ZHJ8	3ZHJ9	20 lb ABC DRY CHEM Cart-Op
Maintenance	Vehicle Shop	By bulk oil drum		3ZHN4	3ZHN5	15 lb Carbon Dioxide
Maintenance	Pump Shop	By parts wash	M27	3ZHND	3ZHNF	15 lb Carbon Dioxide
Maintenance	CRNE AP308	CP5		3ZHMW	3ZHMX	2.5 ABC DRY CHEM
Maintenance	SW Pole	East of hand wash area	M24	3ZHN6	3ZHN7	20 lb ABC DRY CHEM Cart-OP

Table 3
Fire Extinguisher Locations
Big River Zinc Corporation
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DEPARTMENT	LOCATION	Location 2	BRZ #	B/C UNIT	B/C SITE	TYPE
Maintenance	Vehicle Shop	South door	M25	3ZHN8	3ZHN9	20 lb ABC DRY CHEM Cart-Op
Maintenance	Welding Shop	Near South door	M26	3ZHNB	3ZHNC	20 lb ABC DRY CHEM Cart-Op
Maintenance	Instrument Shop	South wall		3ZHNJ	3ZHNK	20 lb ABC DRY CHEM Cart-Op
Maintenance	Crane CP1	Drott Go-Devil		3ZHNO	3ZHN1	5 lb ABC DRY CHEM
Maintenance	Crane 2			3ZHMY	3ZHMZ	5 lb ABC DRY CHEM Cart-Op
Maintenance	Cart CS7			3ZHN2	3ZHN3	5 lb ABC DRY CHEM Cart-Op
Maintenance	Office	Northwest Corner		3ZHNL	3ZHNM	5 lb ABC DRY CHEM Cart-OP
Maintenance	Near north wall on workbench	West of horrizontal mill		3ZHNG	3ZHNH	30 lb Class D Cart-Op
Maintenance	Roast/Acid maint shack	Inside on column		3ZHCF	3ZHCG	15 lb Carbon Dioxide
Pre-Leach	By Maint.			3ZHBS	3ZHBT	15 lb Carbon Dioxide
Pre-Leach	N By Steps	WT Vaccum pump at steps	R31	3ZHBX	3ZHBY	15 lb Carbon Dioxide
Pre-Leach	O/S Oil HS	Oil House	R17	3ZHCH	3ZHCJ	20 lb ABC DRY CHEM
Pre-Leach	Conveyor			3ZHBV	3ZHBW	20 lb ABC DRY CHEM Cart -OP
Pre-Leach	Pump room Basement			3ZHBZ	3ZHCO	20 lb ABC DRY CHEM Cart-Op
Pre-Leach	By Hopper			3ZHC3	3ZHC4	20 lb ABC DRY CHEM Cart-Op
Pre-Leach	Line Cnter			3ZHC5	3ZHC6	20 lb ABC DRY CHEM Cart-Op
Pre-Leach	Line East			3ZHC7	3ZHC8	20 lb ABC DRY CHEM Cart--Op
Pre-Leach	Pump House			3ZHCC	3ZHCD	20 lb ABC DRY CHEM Cart-Op
Pre-Leach	By sub # 7	East of Pre heater on Post	R33	3ZHCK	3ZHCL	20 lb ABC DRY CHEM Cart-Op
Pre-Leach	Control room	Control room	R21	3ZHC1	3ZHC2	20 lb Carbon Dioxide
Purchasing	Store room	Southwest Corner	S3	3ZHNS	3ZHNT	20 lb ABC DRY CHEM Cart-Op
Purchasing	Store room	West pole	S2	3ZHNV	3ZHNW	20 lb ABC DRY CHEM cart-Op
Purchasing	Store room	East pole		3ZHNX	3ZHNY	20 lb ABC DRY CHEM Cart-Op
Purchasing	Hallway	Between restrooms		3ZHNQ	3ZHNR	5 lb ABC DRY CHEM Cart-Op
Roast/ Acid	Ore shed - Center	Conc. Storage center	R2	3ZHCT	3ZHCV	15 lb Carbon Dioxide
Roast/Acid	Acid plant	Coolong Tower	R20	3ZHCP	3ZHCQ	20 lb ABC DRY CHEM Cart-Op
Roast/Acid	Acid Control Room	Acid Control	R19	3ZHCM	3ZHCN	15 lb Carbon Dioxide
Roast/Acid	SE Substation	Motor Control Room-east	R15	3ZHD4	3ZHD5	15 lb Carbon Dioxide
Roast/Acid	Elect Room SW	Motor Control Room-South	R18	3ZHD8	3ZHD9	15 lb Carbon Dioxide
Roast/Acid	Sub Station # 7	Motor Control Room-West	R16	3ZHDB	3ZHDC	15 lb Carbon Dioxide
Roast/Acid	Sub Station # 7	Substation 7	R34	3ZHDD	3ZHDF	15 lb Carbon Dioxide
Roast/Acid	Roaster Southeast			3ZHDL	3ZHDM	15 lb Carbon Dioxide
Roast/Acid	Roaster East Stair			3ZHDQ	3ZHDR	15 lb Carbon Dioxide
Roast/Acid	Roof Center	Hoist house 5th	R5	3ZHF5	3ZHF6	15 lb Carbon Dioxide
Roast/Acid	Ore Shed North	Conc. Storage north	R3	3ZHCR	3ZHCS	20 lb ABC DRY CHEM Cart-OP

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Fire Extinguisher Locations
Big River Zinc Corporation
Sauget, Illinois

DEPARTMENT	LOCATION	Location 2	BRZ #	B/C UNIT	B/C SITE	TYPE
Roast/Acid	Ore Shed South	Conc. Storage South	R1	3ZHCW	3ZHCX	20 lb ABC DRY CHEM Cart-OP
Roast/Acid	Ore Shed Train Dock NW	Conc. unloading SW	R25	3ZHCY	3ZHCZ	20 lb ABC DRY CHEM Cart-OP
Roast/Acid	Ore Shed Train Dock SW	Conc. Unloading E	R26	3ZHDO	3ZHD1	20 lb ABC DRY CHEM Cart-Op
Roast/Acid	Ore Shed Train Dock SE	Conc. Unloading- East	R27	3ZHD2	3ZHD3	20 lb ABC DRY CHEM Cart-OP
Roast/Acid	Roaster North	Roaster 1st Flr Windbox	R14	3ZHD6	3ZHD7	20 lb ABC DRY CHEM Cart-Op
Roast/Acid	Roaster West Stairs	Air Compressor Building	R35	3ZHDG	3ZHDH	20 lb ABC DRY CHEM Cart-Op
Roast/Acid	Roaster SW	Roaster 2nd Flr mid-West	R13	3ZHDJ	3ZHDK	20 lb ABC DRY CHEM Cart-Op
Roast/Acid	Roaster Center			3ZHDN	3ZHDP	20 lb ABC DRY CHEM Cart-Op
Roast/Acid	Roaster SE	Roaster 3rd floor-east	R9	3ZHDS	3ZHDT	20 lb ABC DRY CHEM Cart-OP
Roast/Acid	Roaster SW	Roaster 3rd floor-west	R8	3ZHDV	3ZHDW	20 lb ABC DRY CHEM Cart-OP
Roast/Acid	By Hoppers			3ZHDX	3ZHDY	20 lb ABC DRY CHEM Cart-Op
Roast/Acid	By Hoppers	Roaster 4th floor	R6	3ZHDZ	3ZHFO	20 lb ABC DRY CHEM Cart-Op
Roast/Acid	By Hoppers	Roaster 4th floor	R7	3ZHF1	3ZHF2	20 lb ABC DRY CHEM Cart-Op
Roast/Acid	Bin control	Shaker Screne room	R29	3ZHF3	3ZHF4	20 lb ABC DRY CHEM Cart-Op
Roast/Acid	Foremans Office	Foremans office	R36	3ZHC9	3ZHCB	5 lb ABC DRY CHEM
Roast/Acid	Spill Kit(Hazardous Waste)	Sludge Pad Sump		3ZHRS	3ZHRT	15 lb Carbon Dioxide
Roast/Acid	Spill Kit(Hazardous Waste)	Sludge Pad Sump		W-878545		20lb Carbon Dioxide
Safety	Wash room			3ZHKW	3ZHKX	20 lb ABC DRY CHEM
Safety	Store room			3ZHKY	3ZHKZ	20 lb ABC DRY CHEM
Security	Lunchroom	South wall by light switch	S09	3ZHKT	3ZHKV	20 lb ABC DRY CHEM
Security	Mens Locker room	Dirty side E wall by coat rack	S10	3ZHP3	3ZHP4	15 lb Carbon Dioxide
Security	Mens locker room	W wall next to boiler room	S12	3ZHNZ	3ZHPO	20 lb ABC DRY CHEM Cart-Op
Security	Mens locker room	S Wall next to thermostat	S11	3ZHP1	3ZHP2	20lb ABC DRY CHEM Cart-Op
Security	Guard shack lobby	North wall clock alley	S16	3ZHKR	3ZHKS	20 lb ABC DRY CHEM Cart-Op
Security	Womens locker room	S wall in hall/salary side	S15	3ZHJZ	3ZHKO	20 lb ABC DRY CHEM
Security	Womens Locker room	N wall in hall/hourly side	S14	3ZHK1	3ZHK2	5 lb ABC DRY CHEM
Spare	Safety Storage			3ZHRJ	3ZHRK	10 lb ABC Dry Chem
Spare	Safety storage			3ZHR1	3ZHR5	20 lb ABC DRY CHEM
Spare	Safety Storage			3ZHR2	3ZHR5	20 lb ABC DRY CHEM
Spare	Safety Storage			3ZHR3	3ZHR5	20 lb ABC DRY CHEM
Spare	Safety Storage			3ZHR4	3ZHR5	20 lb ABC DRY CHEM
Spare	Safety Storage			3ZHR6	3ZHRC	20 lb ABC DRY CHEM Cart_op
Spare	Safety Storage			3ZHRT	3ZHRC	20 lb ABC DRY CHEM Cart-Op
Spare	Safety Storage			3ZHR9	3ZHRC	20 lb ABC DRY CHEM Cart-Op

Table 3
Fire Extinguisher Locations
Big River Zinc Corporation
Sauget, Illinois

DEPARTMENT	LOCATION	Location 2	BRZ #	B/C UNIT	B/C SITE	TYPE
Spare	Safety Storage			3ZHRB	3ZHRC	20 lb BC DRY CHEM Cart-Op
Spare	Safety Storage			3ZHRD	3ZHRF	30 lb Class D Cart-Op
Spare	Safety Storage			3ZHRG	3ZHRH	17 lb Halon 1211
Spare	Safety Storage			3ZHRQ	3ZHRR	2.5 Gallon Pressurized Water
Spare	Safety Storage			3ZHR8	3ZHRC	20 lb ABC DRY CHEM Cart-Op
Spare	Safety Storage			3ZHRL	3ZHRM	5 lb ABC DRY CHEM
Test Plant	Pilot Bay	By telephone		3ZHKK	3ZHKL	20 lb Carbon Dioxide
Test Plant	Annex	By East door		3ZHKC	3ZHKD	20 lb ABC DRY CHEM
Test Plant	Zinc Powder			3ZHKF	3ZHKG	20 lb ABC DRY CHEM
Test Plant	Office	By Restroom		3ZHKM	3ZHKN	5 lb ABC DRY CHEM cart-OP
Test Plant	Zinc Powder	Platform		3ZHKH	3ZHKJ	30 lb Class D Cart-Op

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JAN 0 7 2009

RECEIVED JAN 09 2009

REPLY TO THE ATTENTION OF:

LR-8J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

George Obeldobel
President
Big River Zinc Corporation
2401 Mississippi Avenue
Sauget, Illinois 62201

Re: Request for Information
EPA ID No.: ILD062444435

Dear Mr. Obeldobel:

By this letter, the U.S. Environmental Protection Agency requests information under Section 3007 of the Resource Conservation Act (RCRA), as amended, 42 U.S.C. § 6927. Section 3007 authorizes the Administrator of EPA to require you to submit certain information.

This request requires Big River Zinc Corporation ("BRZ" or "you") to submit certain information relating to the storage of hazardous waste at its facility located at 2401 Mississippi Avenue in Sauget, Illinois. We are requiring this information to determine BRZ's compliance status with the Standards Applicable to Generators of Hazardous Waste and the Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities set forth at Title 35 of the Illinois Administrative Code (35 IAC), Parts 722 and 724, respectively. The enclosure specifies the information you must submit. You must submit this information within 14 calendar days of receiving this request to the United States Environmental Protection Agency, Attention: Todd C. Brown, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

You may, under 40 CFR Part 2 Subpart B, assert a business confidentiality claim covering all or part of the information in the manner described in 40 CFR § 2.203(b). We will disclose the information covered by a business confidentiality claim only to extent and by means of the procedures at 40 CFR Part 2, Subpart B. You must make any request for confidentiality when you submit the information since any information not so identified may be made available to the public without further notice.

BRZ must submit all requested information under an authorized signature certifying that the information is true and complete to the best of the signatory's knowledge and belief. Should

the signatory find, at any time after submitting the requested information, that any portion of the submitted information is false, misleading or incomplete, the signatory should notify us. Knowingly providing false information, in response to this request, may be actionable under 18 U.S.C. §§ 1001 and 1341. We may use the requested information in an administrative, civil or criminal action.

This request is not subject to the Paperwork Reduction Act, U.S.C. § 3501 et seq., because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

Failure to comply fully with this request for information may subject BRZ to an enforcement action under Section 3008 of RCRA, 42 U.S.C. § 6928.

You should direct questions about this request for information to Mr. Brown, of my staff, at (312) 886-6091.

Sincerely,

Lorna M. Jereza
Chief, Compliance Section 1
RCRA Branch
Land and Chemicals Division

Enclosure

cc: Todd Marvel, Illinois Environmental Protection Agency (w/ enclosure)
Julie O'Keefe, Armstrong Teasdale LLP (w/ enclosure)

REQUEST FOR INFORMATION

Instructions: You must respond separately to each of the questions or requests in this attachment. Precede each answer with the number of the Request for Information to which it corresponds. For each document produced in response to this Request for Information, indicate on the document, or in some other reasonable manner, the number of the question to which it responds.

Requests

1. Identify all persons consulted in preparing the answers to this Request for Information. Provide the full name and title for each individual identified, business telephone number for each individual identified, and the number of years that each individual has worked for BRZ.

2. Please provide true and accurate copies of all records that report the results of the analyses conducted on samples taken from the demolition of the Leach Building, including the analytical results obtained from any samples taken from demolished concrete, wood and brick.

3. Please describe the condition of the Concrete Concentrate Storage Pad located on the northeast corner of the plant, which was used by BRZ to store hazardous waste debris generated from its demolition activities. In particular:

    a. identify any cracks or gaps in the floor of the concrete pad;
    b. describe any coatings or sealants existing on the surface of the concrete pad;
    c. describe the walls or barriers around the concrete pad;
    d. provide information regarding any inspections or maintenance of the concrete pad by BRZ in the last ten years; and
    e. describe in detail how runoff from the concrete pad is managed.

4. State whether the pile of contaminated wood located immediately to the west of the Concentrate Storage Building and observed by the U.S. EPA inspector during the September 19, 2007 EPA inspection (featured in photograph 11 of the corresponding inspection report) was also located on the Concrete Concentrate Storage Pad.

5. If the answer to 4, above, is negative, describe the condition of the surface upon which the pile of contaminated wood was located. In particular:

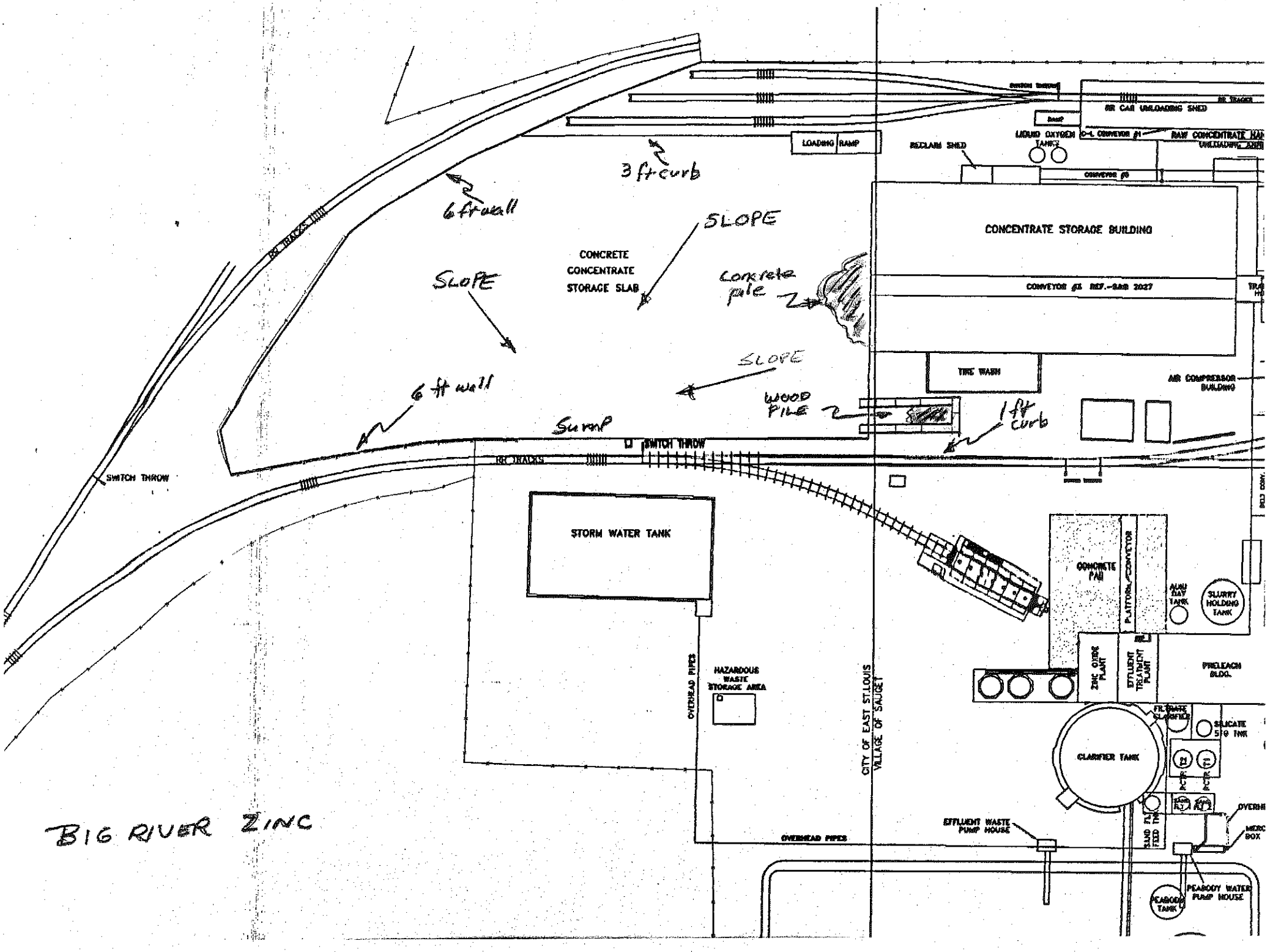
    a. identify if there was any concrete or other surface separating the pile from the underlying soil;
    b. if the answer to 5a, above, is affirmative, identify any cracks or gaps in the concrete or surface material;
    c. if the answer to 5a, above, is affirmative, describe any coatings or sealants existing on the concrete or surface material;

d. if the answer to 5a, above, is affirmative, provide information regarding any inspections or maintenance of the concrete or surface conducted by BRZ in the last ten years; and
e. describe in detail how runoff from the area is managed.

6. Please provide a copy of Big River Zinc's Hazardous Waste Contingency Plan as it existed on September 19, 2007.

7. Provide the following certification by a responsible corporate officer:

> I certify under the penalty of law that I have examined and am familiar with the information submitted in responding to this information request for production of documents. Based on my review of all relevant documents and inquiring of those individuals immediately responsible for providing all relevant information and documents, I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.



BIG RIVER ZINC

BIG RIVER ZINC CORPORATION

2401 Mississippi Avenue
Sauget, Illinois 62201
618 274 5000

Lorna M Jereza
Chief, Compliance Section 1
RCRA Branch
Land and Chemicals Division

Attention: LR-8J Mr. Todd Brown

Re: Request for Information from Big River Zinc Corporation dated Jan 7, 2009

Dear Ms Jereza,

The following are the responses to your request for information dated January 7, 2009.

Request 1

Michael A Altepeter
Environmental Manager/Senior Process Engineer
618 274 5000 x 194
618 410 8021 cell
35 years

Joe Rook
Maintenance Superintendent
618 274 5000 x 196
30 years
Mr. Rook helped to find drawings.

Request 2

A significant number of samples were submitted for TCLP before demolition began to develop a material handling plan. TLCP tests were performed on additional samples during the demolition to verify the preliminary results and to segregate materials by category.

Copies of TCLP analysis of all concrete, wood, and brick are attached. A worksheet summary used during the demolition project is included.

Request 3

The concentrate storage pad is used for unloading and storing Zinc Concentrates. The pad is six to eight inch reinforced concrete with compacted underlayment. The pad covers about 1.3 acres. A few hundred square feet were used to manage the wastes and prepare them for shipment as required by the landfill. A Plan view is enclosed.

a. The pad cannot be inspected at this time because half of it is covered with ice and the entire pad is covered with snow. The weather is to remain cold in the near future and more snow is expected this week. However I do not recall any actual gaps that go all the way through the concrete, although the concrete is chipped off in some areas.

b. The pad has no coatings.

c. The pad is surrounded by a concrete curb or wall and all water collected is drained to a sump. The height varies from 1 foot to 6 foot as shown on the enclosed drawing. The walls and curbs are made of concrete.

d. The pad was repaired in 2002 and the invoice for the repairs is enclosed. The cost of those repairs was about $60,000.

e. The concentrate pad drains to the sump as shown on the enclosed drawing. The sump pumps the water to the storm water storage tank located just east of the concentrate pad as shown on the drawing enclosed. The water from the Stormwater holding tank is metered to the Big River Zinc Corporation wastewater treatment plant. The treated effluent is sent to American Bottoms Physical Chemistry plant and from there to American Bottoms sewage treatment plant.

Request 4

The area where the wood was managed was located on concrete which is part of and drains to the concentrate storage pad.
The contaminated wood was placed in a bunker made of 4' x 8' x 8' concrete cells. This center was located just east of the ore storage shed as shown on the drawing referred to in Request 3. The concrete cell enclosure was eight feet from the concrete curb which is the east boundary of the concentrate storage pad.

Request 5

See request 4.

Request 6

A copy is enclosed.

Request 7

See certification following.

If you need to clarify the answers above do not hesitate to call me at 618 274 5000 x 194 or by e-mail at maltepeter@bigriverzinc.com.

Sincerely

Michael A Altepeter
Environmental Manager/Senior Process Engineer
Big River Zinc Corporation

CERTIFICATION

I certify under penalty of law that I have examined and am familiar with the information submitted in responding to this information request for production of documents. Based on my review of all relevant documents and inquiring of those individuals immediately responsible for providing all relevant information and documents, I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment.

George M. Obeldobel Date 29 January 2009

George M Obeldobel
President
Big River Zinc Corporation

Region V Request for Information from Big River Zinc Corporation Dated Jan 7, 2009

Request number 2

Analytical reports of TCLP for Metals

Data Summary used during demolition of Leach Building

TCLP Results in L/P Building

TCLP Metals Limits	As <5	Ba <100	Cd <1	Cr <5	Pb <5	Se <1	Ag <5	Hg <0.2	
Samples of Brick taken 8/1/07									
contaminated brick	0.3	0.15	260	0.0055	36	0.13	<0.003	<0.0002	FAIL
Samples Taken from wood stave tanks 8/7/07									
#5 Check tank	<0.03	0.06	1.6	0.048	0.42	0.065	0.0065	<0.0002	FAIL
process Water tank	0.27	0.18	4.1	0.027	1.7	<0.02	0.0042	<0.0002	FAIL
#4 check Tank	1.4	0.05	460	0.035	7.3	0.096	0.0063	<0.0002	FAIL
3rd stage tank	4.2	< 2.0	1300	0.019	7.4	0.2	0.015	<0.0002	FAIL
Samples taken of concrete 8/9/07									
2nd Stage Cooling tower steps	<0.03	0.18	<0.004	0.11	<0.02	0.14	<0.003	<0.0002	
Eimco Basement Wall	<0.03	0.18	<0.004	0.25	<0.02	0.15	<0.003	<0.0002	
1st Stage Purification	4.7	0.3	4.8	<0.004	0.41	0.1	<0.003	<0.0002	FAIL
2nd Stage press floor	<0.03	0.2	0.0075	0.05	<0.02	0.18	<0.003	<0.0002	
Old Eimco drum floor	<0.03	0.27	1	0.035	0.086	0.15	<0.003	<0.0002	FAIL
In front of 1st stage tank	2	0.13	<0.004	0.037	<0.02	0.19	0.0037	<0.0002	
Samples taken of concrete 8/21/07									
Cadmium Floor	0.056	0.27	<.004	<.004	<.02	0.16	0.0034	<0.0002	
Eimco Floor	0.033	1	0.77	0.17	0.19	<0.02	<0.003	<0.0002	
First Stage Floor	0.33	0.11	<0.004	0.031	<0.02	0.14	0.0053	<0.0002	
Leach Floor	<0.03	0.56	0.02	0.064	<0.02	0.038	0.0036	<0.0002	
Copper Recovery	<0.03	0.75	0.11	<0.004	<0.02	0.058	0.0041	<0.0002	
Eimco basement Wall	<0.03	0.42	5.2	0.21	<0.02	0.021	0.0057	<0.0002	FAIL
2nd Stage Press floor	<0.03	0.74	2	0.0057	<0.02	0.067	0.005	<0.0002	FAIL

Region V Request for Information from Big River Zinc Corporation Dated Jan 7, 2009

Request number 2

Analytical reports of TCLP for Metals

Laboratory Results for Brick from Brick Lined Tanks

PDC Laboratories, Inc.
3278 N. Highway 67 • Florissant, MO 63033
(314) 432-0550 • (800) 333-FAST (3278) • FAX (314) 432-4977

ACCREDITED IN ACCORDANCE WITH NELAC

Laboratory Results

Big River Zinc
Rt. 3 & Monsanto Ave.

Sauget, IL 62201
Attn : Mr. Mike Altepeter

Date Received : 08/02/07 14:37
Report Date : 08/10/07
Customer # : 201097
P.O. Number : 34339
Facility :

Sample No: **07088038-6** Collect Date **08/01/07 00:01**
Client ID : **CONTAMINATED BRICK** Site : **STL** Locator :

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 1311				
Final pH		5.07	08/06/07 11:00	MEP
Leachate Preparation			08/06/07 11:00	MEP
SW-846 3010A				
Sample Preparation			08/08/07 08:00	JS
SW-846 6010 TCLP				
Arsenic, TCLP		0.3 mg/l	08/08/07 16:06	WPS
Arsenic, TCLP Spike Recovery		118 % Recovery		
Barium, TCLP		0.15 mg/l	08/08/07 16:06	WPS
Barium, TCLP Spike Recovery		99.4 % Recovery		
Cadmium, TCLP		260 mg/l	08/09/07 11:46	WPS
Cadmium, TCLP Spike Recovery		100 % Recovery		
Chromium, TCLP		0.0055 mg/l	08/08/07 16:06	WPS
Chromium, TCLP Spike Recovery		108 % Recovery		
Lead, TCLP		36 mg/l	08/08/07 16:06	WPS
Lead, TCLP Spike Recovery		80 % Recovery		
Selenium, TCLP		0.13 mg/l	08/08/07 16:06	WPS
Selenium, TCLP Spike Recovery		107 % Recovery		
Silver, TCLP	<	0.003 mg/l	08/08/07 16:06	WPS
Silver, TCLP Spike Recovery		101 % Recovery		
SW-846 7470A R1.0				
Mercury Spike Recovery		90 %	08/09/07 14:00	KAE
Mercury, TCLP	<	0.0002 mg/l	08/09/07 14:00	KAE

PDC Laboratories, Inc.
3278 N. Highway 67 • Florissant, MO 63034
(314) 432-0550 • (800) 333-FAST (3278) • FAX (314) 432-4977

ACCREDITED IN ACCORDANCE WITH NELAC

Laboratory Results

Big River Zinc
Rt. 3 & Monsanto Ave.

Sauget, IL 62201
Attn : Mr. Mike Altepeter

Date Received : 08/02/07 14:37
Report Date : 08/10/07
Customer # : 201097
P.O. Number : 34339
Facility :

ACCREDITATIONS

NELAC Accreditation for Wastewater, Hazardous and Solid Wastes Fields of Testing through IL EPA Lab No. 100253.

Certified by: Barbara G. Pandolfo
Barbara G. Pandolfo, Project Manager

ENVIRONMETRICS

311343

CUSTODY TRANSFER RECORD / LABORATORY WORK REQUEST

COMPANY: BigRiverZinc
ADDRESS: 2401 Mississippi Ave
CITY/STATE/ZIP: Sauget Il 62201
PHONE: (618) 274 5000

CONTACT: M Altepeter
DATE: 8-2-07
FAX: (618) 274 4444
E-MAIL: maltepeter@bigriverzinc.com

Turnaround Time: ☐ Normal (8-10 business days) ☒ Rush (5 business days) ☐ Fastrak (3 business days) ☐ 1-2 Business Days ☐ Same Day

Due Date: ______

Delivery Mode: ☐ Fax ☐ E-Mail ☐ Phone Call

INSTRUCTIONS: ______

COC # ______

PROJECT # ______

PO # ______

PAGE ______ OF ______

ITEM	SITE CODE / SAMPLE DESCRIPTION	DATE COLLECTED	TIME COLLECTED	PRESERV.	CONTAINER	ANALYSES REQUEST
1	M 1837 day 1 6h 50	Research Samples		N/C	Bags	
2	M1837 day 2/3 21.41					TCLP Metals
3	M1837 day 4 6h 38					"
4	M1837 day 4 2h 40					"
5	Contaminated Wood	8/1/07	10A			"
6	Contaminated Brick	8/1/07	10A			"
7						"
8						
9						
10						
11						
12						
13						
14						
15						

ITEMS TRANSFERRED	RELINQUISHED BY	Date	Time	RECEIVED BY	Date	Time	REASON for TRANSFER
6	M Altepeter	8/2/07	10 A	Anthony [illegible]	8/2/07	10:10a	
	[illegible]	8/2/07	11:25a	R [illegible]	8/2/07	1125a	
	R [illegible]	8/2/07	1125a	Heather [illegible]	8/2/07	1125	

SPECIAL NOTES / INSTRUCTIONS

EN 1000-001 (REV 4/98)

Region V Request for Information from Big River Zinc Corporation Dated Jan 7, 2009

Request number 2

Analytical reports of TCLP for Metals

Laboratory Results for Wood from Wood Stave Tanks

PDC Laboratories, Inc.
3278 N. Highway 67 • Florissant, MO 63033
(314) 432-0550 • (800) 333-FAST (3278) • FAX (314) 432-4977

ACCREDITED IN ACCORDANCE WITH NELAC

Laboratory Results

Big River Zinc
Rt. 3 & Monsanto Ave.

Sauget, IL 62201
Attn : Mr. Mike Altepeter

Date Received : 08/08/07 09:30
Report Date : 08/15/07
Customer # : 201097
P.O. Number : 34339
Facility :

Sample No: **07088140-4** Collect Date **08/07/07 08:00**
Client ID : **#5 CHECK TANK** Site : **STL** Locator :

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 1311				
Final pH		4.67	08/13/07 12:00	MEP
Leachate Preparation			08/13/07 12:00	MEP
SW-846 3010A				
Sample Preparation			08/14/07 08:00	JS
SW-846 6010 TCLP				
Arsenic, TCLP	<	0.03 mg/l	08/14/07 16:39	WPS
Barium, TCLP		0.06 mg/l	08/14/07 16:39	WPS
Cadmium, TCLP		1.6 mg/l	08/14/07 16:39	WPS
Chromium, TCLP		0.048 mg/l	08/14/07 16:39	WPS
Lead, TCLP		0.42 mg/l	08/14/07 16:39	WPS
Selenium, TCLP		0.065 mg/l	08/14/07 16:39	WPS
Silver, TCLP		0.0065 mg/l	08/14/07 16:39	WPS
SW-846 7470A R1.0				
Mercury Spike Recovery		115 %	08/15/07 12:00	WPS
Mercury, TCLP	<	0.0002 mg/l	08/15/07 12:00	WPS

ACCREDITATIONS

NELAC Accreditation for Wastewater, Hazardous and Solid Wastes Fields of Testing through IL EPA Lab No. 100253.

Certified by: Barbara G. Pandolfo
Barbara G. Pandolfo, Project Manager

PDC Laboratories, Inc.
3278 N. Highway 67 • Florissant, MO 63033
(314) 432-0550 • (800) 333-FAST (3278) • FAX (314) 432-4977

ACCREDITED IN ACCORDANCE WITH

Laboratory Results

Big River Zinc
Rt. 3 & Monsanto Ave.

Sauget, IL 62201
Attn : Mr. Mike Altepeter

Date Received : 08/08/07 09:30
Report Date : 08/15/07
Customer # : 201097
P.O. Number : 34339
Facility :

Sample No: **07088140-2** Collect Date **08/07/07 08:25**
Client ID : **PROCESS WATER TANK** Site : **STL** Locator :

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 1311				
Final pH		4.68	08/13/07 12:00	MEP
Leachate Preparation			08/13/07 12:00	MEP
SW-846 3010A				
Sample Preparation			08/14/07 08:00	JS
SW-846 6010 TCLP				
Arsenic, TCLP		0.27 mg/l	08/14/07 16:23	WPS
Barium, TCLP		0.18 mg/l	08/14/07 16:23	WPS
Cadmium, TCLP		4.1 mg/l	08/14/07 16:23	WPS
Chromium, TCLP		0.027 mg/l	08/14/07 16:23	WPS
Lead, TCLP		1.7 mg/l	08/14/07 16:23	WPS
Selenium, TCLP	<	0.02 mg/l	08/14/07 16:23	WPS
Silver, TCLP		0.0042 mg/l	08/14/07 16:23	WPS
SW-846 7470A R1.0				
Mercury, TCLP	<	0.0002 mg/l	08/15/07 12:00	WPS

Sample No: **07088140-3** Collect Date **08/08/07 08:00**
Client ID : **#4 CHECK TANK** Site : **STL** Locator :

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 1311				
Final pH		5.27	08/13/07 12:00	MEP
Leachate Preparation			08/13/07 12:00	MEP
SW-846 3010A				
Sample Preparation			08/14/07 08:00	JS
SW-846 6010 TCLP				
Arsenic, TCLP		1.4 mg/l	08/14/07 16:36	WPS
Barium, TCLP		0.05 mg/l	08/14/07 16:36	WPS
Cadmium, TCLP		460 mg/l	08/15/07 11:39	WPS
Chromium, TCLP		0.035 mg/l	08/14/07 16:36	WPS
Lead, TCLP		7.3 mg/l	08/14/07 16:36	WPS
Selenium, TCLP		0.096 mg/l	08/14/07 16:36	WPS
Silver, TCLP		0.0063 mg/l	08/14/07 16:36	WPS
SW-846 7470A R1.0				
Mercury, TCLP	<	0.0002 mg/l	08/15/07 12:00	WPS

PDC Laboratories, Inc.
3278 N. Highway 67 • Florissant, MO 63033
(314) 432-0550 • (800) 333-FAST (3278) • FAX (314) 432-4977

ACCREDITED IN ACCORDANCE WITH

Laboratory Results

Big River Zinc
Rt. 3 & Monsanto Ave.

Sauget, IL 62201
Attn : Mr. Mike Altepeter

Date Received : 08/08/07 09:30
Report Date : 08/15/07
Customer # : 201097
P.O. Number : 34339
Facility :

Sample No: **07088140-1** Collect Date **08/07/07 08:15**
Client ID : **3RD STAGE TANK** Site : **STL** Locator :

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 1311				
Final pH		5.88	08/13/07 12:00	MEP
Leachate Preparation			08/13/07 12:00	MEP
SW-846 3010A				
Sample Preparation			08/14/07 08:00	JS
SW-846 6010 TCLP				
Arsenic, TCLP		4.2 mg/l	08/15/07 10:00	WPS
Arsenic, TCLP Spike Recovery		116 % Recovery		
Barium, TCLP	<	2 mg/l	08/15/07 10:26	WPS
Barium, TCLP Spike Recovery		104 % Recovery		
Cadmium, TCLP		1300 mg/l	08/15/07 10:26	WPS
Cadmium, TCLP Spike Recovery		100 % Recovery		
Chromium, TCLP		0.019 mg/l	08/15/07 10:00	WPS
Chromium, TCLP Spike Recovery		102 % Recovery		
Lead, TCLP		7.4 mg/l	08/15/07 10:26	WPS
Lead, TCLP Spike Recovery		106 % Recovery		
Selenium, TCLP		0.2 mg/l	08/15/07 10:00	WPS
Selenium, TCLP Spike Recovery		120 % Recovery		
Silver, TCLP		0.015 mg/l	08/15/07 10:00	WPS
Silver, TCLP Spike Recovery		101 % Recovery		
SW-846 7470A R1.0				
Mercury, TCLP	<	0.0002 mg/l	08/15/07 12:00	WPS

THE D RUN COMPANY
CENTI LAB
Viburnum, MO 65566

PDC Laboratories INC
3278 N Hwy 67
Florissant mo 63033

CUSTODY TRANSFER RECORD AND LABORATORY WORK R ST

Attn Keith Earhart

PROJECT NO./ID: BRRD Slags

REPORT RESULTS TO: Jim Lanzafame

ITEM	SAMPLE DESCRIPTION	DATE and TIME COLLECTED	PRESERV	TYPE OF CONTANR	ANALYSIS REQUIRED									
					As	Cd	ba	Cr	Pb	Se	Ag	Hg	-	
1	Bin #5 #1551	8-13-07 @ 8:30 Am	NON	Plastic		✓	✓		✓					TCLP Analys
2	Bin #6 #1550	"	"	"		✓	✓		✓					w/1day Turn around
3														
4														
5														
6														
7														
8														
9														
10														

ITEMS TRANSFRD	DATE	TIME	RELINQUISHED BY:	RECEIVED BY:	REASON FOR TRANSFER
2	8-13-07	8:30 Am	Paul Lindeman	Heather Cashwell	Lab

Region V Request for Information from Big River Zinc Corporation Dated Jan 7, 2009

Request number 2

Analytical reports of TCLP for Metals

Laboratory Results for Concrete from Floors and Basement Walls in Leach Building

PDC Laboratories, Inc.
3278 N. Highway 67 • Florissant, MO 63033
(314) 432-0550 • (800) 333-FAST (3278) • FAX (314) 432-4977

ACCREDITED IN ACCORDANCE WITH NELAC

Laboratory Results

Big River Zinc
Rt. 3 & Monsanto Ave.

Sauget, IL 62201
Attn : Mr. Mike Altepeter

Date Received : 08/13/07 15:55
Report Date : 08/16/07
Customer # : 201097
P.O. Number : 34339
Facility :

Sample No: **07088200-1** Collect Date **08/09/07 10:00**
Client ID : **CONCRETE STEPS** Site : **STL** Locator : **OLD COOLING TOWER**

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 1311				
Final pH		11.38	08/14/07 13:00	MEP
Leachate Preparation			08/14/07 13:00	MEP
SW-846 3010A				
Sample Preparation			08/15/07 08:00	JS
SW-846 6010 TCLP				
Arsenic, TCLP	<	0.03 mg/l	08/15/07 11:13	WPS
Barium, TCLP		0.18 mg/l	08/15/07 11:13	WPS
Cadmium, TCLP	<	0.004 mg/l	08/15/07 11:13	WPS
Chromium, TCLP		0.11 mg/l	08/15/07 11:13	WPS
Lead, TCLP	<	0.02 mg/l	08/15/07 11:13	WPS
Selenium, TCLP		0.14 mg/l	08/15/07 11:13	WPS
Silver, TCLP	<	0.003 mg/l	08/15/07 11:13	WPS
SW-846 7470A R1.0				
Mercury Spike Recovery		110 %	08/15/07 12:00	WPS
Mercury, TCLP	<	0.0002 mg/l	08/15/07 12:00	WPS

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Laboratory Results

Big River Zinc
Rt. 3 & Monsanto Ave.

Sauget, IL 62201
Attn : Mr. Mike Altepeter

Date Received : 08/13/07 15:55
Report Date : 08/16/07
Customer # : 201097
P.O. Number : 34339
Facility :

Sample No: **07088200-2** Collect Date **08/09/07 14:10**
Client ID : **EIMCO BASEMENT WALL** Site : **STL** Locator : **UNDER WOODEN LAMP**

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 1311				
Final pH		11.11	08/14/07 13:00	MEP
Leachate Preparation			08/14/07 13:00	MEP
SW-846 3010A				
Sample Preparation			08/15/07 08:00	JS
SW-846 6010 TCLP				
Arsenic, TCLP	<	0.03 mg/l	08/15/07 11:16	WPS
Arsenic, TCLP Spike Recovery		137 % Recovery		
Barium, TCLP		0.18 mg/l	08/15/07 11:16	WPS
Barium, TCLP Spike Recovery		103 % Recovery		
Cadmium, TCLP	<	0.004 mg/l	08/15/07 11:16	WPS
Cadmium, TCLP Spike Recovery		110 % Recovery		
Chromium, TCLP		0.25 mg/l	08/15/07 11:16	WPS
Chromium, TCLP Spike Recovery		107 % Recovery		
Lead, TCLP	<	0.02 mg/l	08/15/07 11:16	WPS
Lead, TCLP Spike Recovery		108 % Recovery		
Selenium, TCLP		0.15 mg/l	08/15/07 11:16	WPS
Selenium, TCLP Spike Recovery		115 % Recovery		
Silver, TCLP	<	0.003 mg/l	08/15/07 11:16	WPS
Silver, TCLP Spike Recovery		107 % Recovery		
SW-846 7470A R1.0				
Mercury, TCLP	<	0.0002 mg/l	08/15/07 12:00	WPS

recycled paper

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Laboratory Results

Big River Zinc
Rt. 3 & Monsanto Ave.

Sauget, IL 62201
Attn : Mr. Mike Altepeter

Date Received : 08/13/07 15:55
Report Date : 08/16/07
Customer # : 201097
P.O. Number : 34339
Facility :

Sample No: **07088200-3** Collect Date **08/09/07 14:05**
Client ID : **1ST STG.PURIFICATION** Site : **STL** Locator :

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 1311				
Final pH		6.39	08/14/07 13:00	MEP
Leachate Preparation			08/14/07 13:00	MEP
SW-846 3010A				
Sample Preparation			08/15/07 08:00	JS
SW-846 6010 TCLP				
Arsenic, TCLP		4.7 mg/l	08/15/07 11:43	WPS
Barium, TCLP		0.3 mg/l	08/15/07 11:43	WPS
Cadmium, TCLP		4.8 mg/l	08/15/07 11:43	WPS
Chromium, TCLP	<	0.004 mg/l	08/15/07 11:43	WPS
Lead, TCLP		0.41 mg/l	08/15/07 11:43	WPS
Selenium, TCLP		0.1 mg/l	08/15/07 11:43	WPS
Silver, TCLP	<	0.003 mg/l	08/15/07 11:43	WPS
SW-846 7470A R1.0				
Mercury, TCLP	<	0.0002 mg/l	08/15/07 12:00	WPS

Sample No: **07088200-4** Collect Date **08/10/07 14:15**
Client ID : **2ND STG.PRESS FLOOR** Site : **STL** Locator :

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 1311				
Final pH		9.26	08/14/07 13:00	MEP
Leachate Preparation			08/14/07 13:00	MEP
SW-846 3010A				
Sample Preparation			08/15/07 08:00	JS
SW-846 6010 TCLP				
Arsenic, TCLP	<	0.03 mg/l	08/15/07 11:46	WPS
Barium, TCLP		0.2 mg/l	08/15/07 11:46	WPS
Cadmium, TCLP		0.0075 mg/l	08/15/07 11:46	WPS
Chromium, TCLP		0.05 mg/l	08/15/07 11:46	WPS
Lead, TCLP	<	0.02 mg/l	08/15/07 11:46	WPS
Selenium, TCLP		0.18 mg/l	08/15/07 11:46	WPS
Silver, TCLP	<	0.003 mg/l	08/15/07 11:46	WPS
SW-846 7470A R1.0				
Mercury, TCLP	<	0.0002 mg/l	08/15/07 12:00	WPS

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Laboratory Results

Big River Zinc
Rt. 3 & Monsanto Ave.

Sauget, IL 62201
Attn : Mr. Mike Altepeter

Date Received : 08/13/07 15:55
Report Date : 08/16/07
Customer # : 201097
P.O. Number : 34339
Facility :

Sample No: **07088200-5** Collect Date **08/10/07 14:20**
Client ID : **OLD EIMCO DRUM FILTR** Site : **STL** Locator :

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 1311				
Final pH		7.1	08/14/07 13:00	MEP
Leachate Preparation			08/14/07 13:00	MEP
SW-846 3010A				
Sample Preparation			08/15/07 08:00	JS
SW-846 6010 TCLP				
Arsenic, TCLP	<	0.03 mg/l	08/15/07 11:49	WPS
Barium, TCLP		0.27 mg/l	08/15/07 11:49	WPS
Cadmium, TCLP		1 mg/l	08/15/07 11:49	WPS
Chromium, TCLP		0.035 mg/l	08/15/07 11:49	WPS
Lead, TCLP		0.086 mg/l	08/15/07 11:49	WPS
Selenium, TCLP		0.15 mg/l	08/15/07 11:49	WPS
Silver, TCLP	<	0.003 mg/l	08/15/07 11:49	WPS
SW-846 7470A R1.0				
Mercury, TCLP	<	0.0002 mg/l	08/15/07 12:00	WPS

Sample No: **07088200-6** Collect Date **08/10/07 14:30**
Client ID : **1ST STG.PURIFICATION** Site : **STL** Locator : **IN FRNT FRST STG TNK**

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 1311				
Final pH		10.35	08/14/07 13:00	MEP
Leachate Preparation			08/14/07 13:00	MEP
SW-846 3010A				
Sample Preparation			08/15/07 08:00	JS
SW-846 6010 TCLP				
Arsenic, TCLP		2 mg/l	08/15/07 11:52	WPS
Barium, TCLP		0.13 mg/l	08/15/07 11:52	WPS
Cadmium, TCLP	<	0.004 mg/l	08/15/07 11:52	WPS
Chromium, TCLP		0.037 mg/l	08/15/07 11:52	WPS
Lead, TCLP	<	0.02 mg/l	08/15/07 11:52	WPS
Selenium, TCLP		0.19 mg/l	08/15/07 11:52	WPS
Silver, TCLP		0.0037 mg/l	08/15/07 11:52	WPS
SW-846 7470A R1.0				
Mercury, TCLP	<	0.0002 mg/l	08/15/07 12:00	WPS

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Laboratory Results

Big River Zinc
Rt. 3 & Monsanto Ave.

Sauget, IL 62201
Attn : Mr. Mike Altepeter

Date Received : 08/13/07 15:55
Report Date : 08/16/07
Customer # : 201097
P.O. Number : 34339
Facility :

ACCREDITATIONS

NELAC Accreditation for Wastewater, Hazardous and Solid Wastes Fields of Testing through IL EPA Lab No. 100253.

Certified by: Barbara G. Pandolfo
Barbara G. Pandolfo, Project Manager

PDC Laboratories, Inc. – St. Louis
3278 N. Highway 67 (Lindbergh)
Florissant, MO 63033
www.pdclab.com www.environmetrics.net

CHAIN OF CUSTODY RECORD

Phone (314) 432-0550 or (314) 921-4488
Fax (314) 432-4977 or (314) 921-4494

State where samples collected _____

(Instructions/Sample Acceptance Policy on Reverse)

ALL SHADED AREAS MUST BE COMPLETED BY CLIENT (PLEASE PRINT)

1 CLIENT: B.C. River Zinc	PROJECT NUMBER	P.O. NUMBER	MEANS SHIPPED
ADDRESS: 2401 Mississippi Ave.	PHONE NUMBER	FAX NUMBER	EMAIL ADDRESS
CITY STATE ZIP: Sauget IL 62201	SAMPLER: Hayward		MATRIX TYPES: WW-WASTEWATER, DW-DRINKING WATER, GW-GROUND WATER, WW/SL-SLUDGE, NAS-SOLID, LCHT-LEACHATE, NAL-NONAQUEOUS, SOIL-SOILS
CONTACT PERSON: Mike Alexander	SAMPLER'S SIGNATURE:		

2 SAMPLE DESCRIPTION AS YOU WANT ON REPORT	DATE COLLECTED	TIME COLLECTED	SAMPLE TYPE: GRAB	COMP	MATRIX TYPE	Bottle Count	3 ANALYSIS REQUESTED: TCLP Metals	4 (FOR LAB USE ONLY)
Concrete steps old cooling tower	8/9/07	1000	V		Concrete			LOGIN # 070889.00
Eimco Basement Wall under Wooden Camp.	8/9/07	1410	V		"			LOGGED BY: HE
1st Stg Purification Presses	8/9/07	1405	V		"			LAB PROJ. #
2nd Stg Press Flour	8/10/07	1415	V		"			TEMPLATE:
Old Eimco Drum Filters	8/10/07	1220	V		"			PROJ. MGR.:
1st Stage Purification in front of First Stage Tanks	8/10/07	1430	V		"			REMARKS

6 TURNAROUND TIME (RUSH TAT IS SUBJECT TO PDC LABS APPROVAL AND SURCHARGE)

NORMAL (8-10 Bus. Days) RUSH (5 Bus. Days) FasTrak™ (3 Bus. Days) 1-2 Bus. Days Same Day

DATE DUE _____

RESULTS BY: E-MAIL FAX PHONE CALL PHONE/FAX# IF DIFFERENT FROM ABOVE

The sample temperature will be measured upon receipt at the lab. By initialing this area, you request that the lab notify you, before proceeding with analysis, if the sample temperature is outside of the range of 0.1-6.0°C. By not initialing this area, you allow the lab to proceed with analytical testing regardless of the sample temperature. _____

6

7 RELINQUISHED BY: (SIGNATURE)	DATE	TIME	RECEIVED BY:	DATE	TIME
	8/13/07	1000	Courier	8/13/07	10:07
RELINQUISHED BY: (SIGNATURE)	DATE 8/13/07	TIME 1300	RECEIVED BY:	DATE 8/13/07	TIME 13:00
RELINQUISHED BY: (SIGNATURE)	DATE 8/13/07	TIME 15:30	RECEIVED BY: Heather Caldwell	DATE 8/13/07	TIME 15.30
RELINQUISHED BY: (SIGNATURE)	DATE	TIME	RECEIVED BY:	DATE	TIME

8 COMMENTS:(FOR LAB USE ONLY)

SAMPLE TEMPERATURE UPON RECEIPT	____°C
CHILL PROCESS STARTED PRIOR TO RECEIPT	Y OR N
SAMPLES(S) RECEIVED ON ICE	Y OR N
PROPER BOTTLES RECEIVED IN GOOD CONDITION	Y OR N
BOTTLES FILLED WITH ADEQUATE VOLUME	Y OR N
SAMPLES RECEIVED WITHIN HOLD TIME(S) (EXCLUDES TYPICAL FIELD PARAMETERS)	Y OR N
DATE AND TME TAKEN FROM SAMPLE BOTTOM	____

Thank you using PDC Laboratories, Inc. Locations in Peoria, IL; St. Louis, MO; and Springfield, MO

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ACCREDITED IN ACCORDANCE WITH nelac

Laboratory Results

Big River Zinc
Rt. 3 & Monsanto Ave.

Sauget, IL 62201
Attn : Mr. Mike Altepeter

Date Received : 08/21/07 16:04
Report Date : 08/23/07
Customer # : 201097
P.O. Number : 34339
Facility :

Sample No: **07088355-1** Collect Date **08/21/07 08:10**
Client ID : **CADMIUM FLOOR** Site : **STL** Locator : **BY STRANTIUM TANKS**

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 1311				
Final pH		8.09	08/22/07 12:30	MEP,FM
Leachate Preparation			08/22/07 12:30	MEP,FM
SW-846 3010A				
Sample Preparation			08/23/07 08:00	JS
SW-846 6010 TCLP				
Arsenic, TCLP		0.056 mg/l	08/23/07 11:11	WPS
Arsenic, TCLP Spike Recovery		121 % Recovery		
Barium, TCLP		0.27 mg/l	08/23/07 11:11	WPS
Barium, TCLP Spike Recovery		103 % Recovery		
Cadmium, TCLP	<	0.004 mg/l	08/23/07 11:11	WPS
Cadmium, TCLP Spike Recovery		110 % Recovery		
Chromium, TCLP	<	0.004 mg/l	08/23/07 11:11	WPS
Chromium, TCLP Spike Recovery		110 % Recovery		
Lead, TCLP	<	0.02 mg/l	08/23/07 11:11	WPS
Lead, TCLP Spike Recovery		110 % Recovery		
Selenium, TCLP		0.16 mg/l	08/23/07 11:11	WPS
Selenium, TCLP Spike Recovery		124 % Recovery		
Silver, TCLP		0.0034 mg/l	08/23/07 11:11	WPS
Silver, TCLP Spike Recovery		109 % Recovery		
SW-846 7470A R1.0				
Mercury Spike Recovery		115 %	08/23/07 11:20	WPS
Mercury, TCLP	<	0.0002 mg/l	08/23/07 11:20	WPS

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ACCREDITED IN ACCORDANCE WITH nelac

Laboratory Results

Big River Zinc
Rt. 3 & Monsanto Ave.

Sauget, IL 62201
Attn : Mr. Mike Altepeter

Date Received : 08/21/07 16:04
Report Date : 08/23/07
Customer # : 201097
P.O. Number : 34339
Facility :

Sample No: **07088355-2** Collect Date **08/21/07 08:30**
Client ID : **FLR BY OLD EIMCO FTR** Site : **STL** Locator :

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 1311				
Final pH		5.24	08/22/07 12:30	MEP,FM
Leachate Preparation			08/22/07 12:30	MEP,FM
SW-846 3010A				
Sample Preparation			08/23/07 08:00	JS
SW-846 6010 TCLP				
Arsenic, TCLP		0.033 mg/l	08/23/07 11:22	WPS
Barium, TCLP		1 mg/l	08/23/07 11:22	WPS
Cadmium, TCLP		0.77 mg/l	08/23/07 11:22	WPS
Chromium, TCLP		0.17 mg/l	08/23/07 11:22	WPS
Lead, TCLP		0.19 mg/l	08/23/07 11:22	WPS
Selenium, TCLP	<	0.02 mg/l	08/23/07 11:22	WPS
Silver, TCLP	<	0.003 mg/l	08/23/07 11:22	WPS
SW-846 7470A R1.0				
Mercury, TCLP	<	0.0002 mg/l	08/23/07 11:20	WPS

Sample No: **07088355-3** Collect Date **08/21/07 09:00**
Client ID : **FIRST STAGE FLOOR** Site : **STL** Locator :

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 1311				
Final pH		10.48	08/22/07 12:30	MEP,FM
Leachate Preparation			08/22/07 12:30	MEP,FM
SW-846 3010A				
Sample Preparation			08/23/07 08:00	JS
SW-846 6010 TCLP				
Arsenic, TCLP		0.33 mg/l	08/23/07 11:36	WPS
Barium, TCLP		0.11 mg/l	08/23/07 11:36	WPS
Cadmium, TCLP	<	0.004 mg/l	08/23/07 11:36	WPS
Chromium, TCLP		0.031 mg/l	08/23/07 11:36	WPS
Lead, TCLP	<	0.02 mg/l	08/23/07 11:36	WPS
Selenium, TCLP		0.14 mg/l	08/23/07 11:36	WPS
Silver, TCLP		0.0053 mg/l	08/23/07 11:36	WPS
SW-846 7470A R1.0				
Mercury, TCLP	<	0.0002 mg/l	08/23/07 11:20	WPS

BIG RIVER ZINC CORPORATION
2401 MISSISSIPPI AVENUE
SAUGET, ILLINOIS 62201-1078

TEL: 618-274-5000
FAX: 618-274-4444

Todd. C. Brown
United States Environmental Protection Agency
Region 5 LR-8J
77 West Jackson Boulevard
Chicago, Il 60604-3590

Re: Pre- filing Notice and Opportunity to Confer
Big River Zinc Corporation
EPA ID No: ILD 062444435

Dear Mr. Brown,

Big River Zinc chooses to confer with USEPA concerning the Administrative Complaint that USEPA intends to file.

Please advise us as to the times and places available for the conference and those who will attend other than you. I have a previously scheduled trip to Finland the week of April 28th.

Please contact me at 618 274 5000 x 194 or maltepeter@bigriverzinc.com.

Sincerely

Michael A Altepeter
Environmental Manager/Senior Process Engineer.

Todd Brown/R5/USEPA/US
04/24/2008 01:30 PM

To maltepeter@bigriverzinc.com
cc
bcc Karen Peaceman/R5/USEPA/US@EPA

Subject Conference Availability

Dear Mr. Altepeter:

This e-mail is in response to your letter regarding a request to confer with U.S. EPA on the proposed RCRA Complaint.

Your letter indicated that Big River Zinc would not be available the week of April 28th. At the moment, May 6th and May 8th appear to be the earliest dates EPA would be available. Please let me know if either of those dates are satisfactory, and what time of the day you would prefer to hold the conference. EPA could accommodate either a morning or afternoon meeting.

The meeting would be held at Region 5's office in downtown Chicago (77 W. Jackson Blvd., Chicago IL, 60604). Myself and Karen Peaceman, Attorney, Office of Regional Counsel, would be attending on behalf of U.S. EPA.

However, if you prefer, the meeting can be held via conference call.

Sincerely,

Todd C. Brown
U.S. EPA - Region 5
Land & Chemicals Division
RCRA Branch
(312) 886-6091
brown.todd@epa.gov

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

APR 07 2008

REPLY TO THE ATTENTION OF:
LR-8J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

George Obeldobel
President
Big River Zinc Corporation
2401 Mississippi Avenue
Sauget, IL 62201

RE: Pre-filing Notice and Opportunity to Confer
Big River Zinc Corporation
EPA ID No.: ILD062444435

Dear Mr. Obeldobel:

This letter is to notify you that the United States Environmental Protection Agency (U.S. EPA) is prepared to file an administrative complaint for civil penalties against Big River Zinc Corporation. In addition, this letter informs you that U.S. EPA deems Big River Zinc Corporation to be a Significant Non-Complier. We are offering you an opportunity to confer with us in advance of our filing a complaint.

On September 19, 2007, the U.S. EPA conducted a hazardous waste inspection at your facility, Big River Zinc Corporation (Big River Zinc) located at 2401 Mississippi Avenue, Sauget, Illinois. Based on information collected during the inspection, U.S. EPA has determined that Big River Zinc violated certain requirements of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §§ 6901 et seq., as amended. These violations were previously identified in a Notice of Violation issued to Big River Zinc on January 17, 2008. Specifically, these violations include the following:

- **35 IAC § 703.121(a): Storage of Hazardous Waste without a Permit.** At the time of the inspection, Big River Zinc was storing hazardous waste concrete and wood in two waste piles. Big River Zinc did not have a permit to store hazardous waste in waste piles, and generators storing hazardous waste without a permit must store their hazardous waste in containers, tanks, containment buildings or drip pads.

- **35 IAC § 724.152: Contingency Plan Content.** At the time of the inspection, Big River Zinc's hazardous waste contingency plan did not include: a description of arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State

and local emergency response teams to coordinate emergency services; the addresses of the two persons listed as alternate emergency coordinators; and a brief outline of the capabilities of the emergency equipment listed in the plan.

- **35 IAC § 724.116(d)(3): Description of Training Program.** At the time of the inspection, Big River Zinc did not have a document that provided a written description of the type and amount of both introductory and continuing training that will be given to each person filling an position related to hazardous waste management.

Based on the relevant liability and penalty information currently available to us, we have calculated a preliminary penalty of $74,062 for the complaint. This potential penalty reflects our preliminary view of the gravity and duration of the violation, without regard to the "adjustment" factors discussed below and in the U.S. EPA's June 2003 *RCRA Civil Penalty Policy* (Penalty Policy). The final penalty we propose in the complaint may differ from this figure, based upon our consideration of any relevant new information you provide, and upon our further consideration of the Penalty Policy's adjustment factors.

This letter is not a demand to pay a penalty. We will not ask you to pay a penalty until we file the complaint or a final order. Before filing the complaint, we are giving you the opportunity to present any information that you believe we should consider regarding your liability for these violations and an appropriate penalty for them. You may present this information in writing or in a meeting with U.S. EPA representatives. Relevant information regarding liability might include evidence that you did not violate the law or evidence that we identified the wrong party.

You may also present information that you believe is relevant to the amount of our proposed penalty. Under RCRA we are required to consider the seriousness of the violation and any good faith efforts your company made to comply with the requirement violated. Factors relevant to the seriousness of the violation include, but are not limited to, the risks of exposure to hazardous wastes from the violation, the potential seriousness of contamination that could have resulted from the violation, the extent to which your company deviated from the requirement, and how many days the violation lasted. Factors relevant to good faith efforts your company made to comply could include evidence that you relied on compliance assistance from U.S. EPA or a state agency.

The Penalty Policy "adjustment factors" relevant to penalty include: (1) any good faith efforts your company made to comply with the requirement violated, (2) the expenses your company delayed or avoided by not complying with the requirement(s), (3) the degree to which the violation was willful, (4) whether your company has a prior history of not complying with RCRA, (5) financial inability to pay, and (6) other unique factors. Information relevant to good faith efforts to comply with the requirement may include, for example, records documenting actions the company took to comply prior to the time that U.S. EPA or another governmental agency first discovered the violations in this case.

Additionally, if your company notifies us that it may be financially unable to pay a penalty of $74,062 or greater, we will consider its ability to pay prior to finalizing our penalty proposal and

filing a complaint, provided that you submit to us required financial documentation to support such a claim. Accordingly, if you believe that your company may be financially unable to pay a $74,062 or greater penalty, please provide us certified financial statements, including balance sheets, and copies of your company's signed income tax returns with all schedules, for the past three years. We will not consider an "ability to pay" claim without such financial information.

You may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B, for any portion of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent allowed by 40 C.F.R. Part 2, Subpart B. If you fail to assert a business confidentiality claim, U.S. EPA may make all submitted information available, without further notice, to any member of the public who requests it.

If you choose to respond to this letter or to confer with us, you should contact Todd C. Brown, of the RCRA Branch, in writing within seven 10 business days of your receipt of this Notice. Please be advised that this conference is not a settlement negotiation covered by Federal Rule of Evidence 408; we may use any information you submit in support of an administrative, civil or criminal action. At the conclusion of the conference or thereafter (or after you have completed a written reply if you do not wish to have a conference), we may give you the opportunity to engage in settlement negotiations before we file the complaint. In the event that pre-filing settlement negotiations commence and are successful, a settlement agreement can be filed simultaneously with the complaint, under Agency regulations at 40 CFR § 22.13(b).

If you decide not to respond to this letter or to confer with us, U. S. EPA may proceed with the enforcement action against Big River Zinc as authorized under Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), including the assessment of appropriate civil penalties.

A copy of the document "U.S. EPA Small Business Resources" is enclosed for your reference. If you have any technical questions regarding the alleged violations, please contact Mr. Brown at (312) 886-6091. You should direct legal inquiries to Karen Peaceman, Assistant Regional Counsel, at (312) 353-5751.

Sincerely,

Willie H. Harris

Willie H. Harris, P.E.
Chief, RCRA Branch
Land and Chemicals Division

cc: Todd Marvel, Illinois Environmental Protection Agency

Enclosure

United States
Environmental Protection
Agency

Office of Enforcement and Compliance Assurance (2201A)
EPA 300-F-07-003 October 2007

Office of Enforcement and Compliance Assurance

INFORMATION SHEET

U. S. EPA Small Business Resources

If you own a small business, the United States Environmental Protection Agency (EPA) offers a variety of compliance assistance resources such as workshops, training sessions, hotlines, websites, and guides to assist you in complying with federal and state environmental laws. These resources can help you understand your environmental obligations, improve compliance, and find cost-effective ways to comply through the use of pollution prevention and other innovative technologies.

Compliance Assistance Centers

(www.assistancecenters.net)
In partnership with industry, universities, and other federal and state agencies, EPA has established Compliance Assistance Centers that provide information targeted to industries with many small businesses.

Agriculture
(www.epa.gov/agriculture or 1-888-663-2155)

Automotive Recycling Industry
(www.ecarcenter.org)

Automotive Service and Repair
(www.ccar-greenlink.org or 1-888-GRN-LINK)

Chemical Industry
(www.chemalliance.org)

Construction Industry
(www.cicacenter.org or 1-734-995-4911)

Education
(www.campuserc.org)

Healthcare Industry
(www.hercenter.org or 1-734-995-4911)

Metal Finishing
(www.nmfrc.org or 1-734-995-4911)

Paints and Coatings
(www.paintcenter.org or 1-734-995-4911)

Printed Wiring Board Manufacturing
(www.pwbrc.org or 1-734-995-4911)

Printing
(www.pneac.org or 1-888-USPNEAC)

Transportation Industry
(www.transource.org)

Tribal Governments and Indian Country
(www.epa.gov/tribal/compliance or 202–564-2516)

US Border Environmental Issues
(www.bordercenter.org or 1-734-995-4911)

The Centers also provide State Resource Locators (www.envcap.org/statetools/index.cfm) for a wide range of topics to help you find important environmental compliance information specific to your state.

EPA Websites

EPA has several Internet sites that provide useful compliance assistance information and materials for small businesses. If you don't have access to the Internet at your business, many public libraries provide access to the Internet at minimal or no cost.

EPA's Home Page
www.epa.gov

Small Business Gateway
www.epa.gov/smallbusiness

Compliance Assistance Home Page
www.epa.gov/compliance/assistance

Office of Enforcement and Compliance Assurance
www.epa.gov/compliance

Voluntary Partnership Programs
www.epa.gov/partners

U.S. EPA SMALL BUSINESS RESOURCES

Hotlines, Helplines & Clearinghouses

(www.epa.gov/epahome/hotline.htm)
EPA sponsors many free hotlines and clearinghouses that provide convenient assistance regarding environmental requirements. A few examples are listed below:

Clean Air Technology Center
(www.epa.gov/ttn/catc or 1-919-541-0800)

Emergency Planning and Community Right-To-Know Act
(www.epa.gov/superfund/resources/infocenter/epcra.htm or 1-800-424-9346)

EPA's Small Business Ombudsman Hotline provides regulatory and technical assistance information.
(www.epa.gov/sbo or 1-800-368-5888)

The National Environmental Compliance Assistance Clearinghouse provides quick access to compliance assistance tools, contacts, and planned activities from the U.S. EPA, states, and other compliance assistance providers
(www.epa.gov/clearinghouse)

National Response Center to report oil and hazardous substance spills.
(www.nrc.uscg.mil or 1-800-424-8802)

Pollution Prevention Information Clearinghouse
(www.epa.gov/opptintr/ppic or 1-202-566-0799)

Safe Drinking Water Hotline
(www.epa.gov/safewater/hotline/index.html or 1-800-426-4791)

Stratospheric Ozone Refrigerants Information
(www.epa.gov/ozone or 1-800-296-1996)

Toxics Assistance Information Service also includes asbestos inquiries.
(1-202-554-1404)

Wetlands Helpline
(www.epa.gov/owow/wetlands/wetline.html or 1-800-832-7828)

State Agencies

Many state agencies have established compliance assistance programs that provide on-site and other types of assistance. Contact your local state environmental agency for more information or the following two resources:

EPA's Small Business Ombudsman
(www.epa.gov/sbo or 1-800-368-5888)

Small Business Environmental Homepage
(www.smallbiz-enviroweb.org or 1-724-452-4722)

Compliance Incentives

EPA provides incentives for environmental compliance. By participating in compliance assistance programs or voluntarily disclosing and promptly correcting violations before an enforcement action has been initiated, businesses may be eligible for penalty waivers or reductio
EPA has two policies that potentially apply to small businesses:

The Small Business Compliance Policy
(www.epa.gov/compliance/incentives/smallbusiness)

Audit Policy
(www.epa.gov/compliance/incentives/auditing)

Commenting on Federal Enforcement Actions and Compliance Activities

The Small Business Regulatory Enforcement Fairness Act (SBREFA) established an SBA Ombudsman and 10 Regional Fairness Boards to receive comments from small businesses about federal agency enforcement actions. If you believe that you fall within the Small Business Administration's definition of a small business (based on your North American Industry Classification System (NAICS) designation, number of employees, or annual receipts, defined at 13 C.F.R. 121.201; in most cases, this means a business with 500 or fewer employees), and wish to comment on federal enforcement and compliance activities, call the SBREFA Ombudsman's toll-free number at 1-888-REG-FAIR (1-888-734-3247).

Every small business that is the subject of an enforcement or compliance action is entitled to comment on the Agency's actions without fear of retaliation. EPA employees are prohibited from using enforcement or any other means of retaliation against any member of the regulated community in response to comments made under SBREFA.

Your Duty to Comply

If you receive compliance assistance or submit comments to the SBREFA Ombudsman or Regional Fairness Boards, you still have the duty to comply with the law, including providing timely responses to EPA information requests, administrative or civil complaints, other enforcement actions or communications. The assistance information and comment processes do not give you any new rights or defenses in any enforcement action. These processes also do not affect EPA's obligation to protect public health or the environment under any of the environmental statutes it enforces, including the right to take emergency remedial or emergency response actions when appropriate. Those decisions will be based on the facts in each situation. The SBREFA Ombudsman and Fairness Boards do not participate in resolving EPA's enforcement actions. Also, remember that to preserve your rights, you need to comply with all rules governing the enforcement process.

EPA is disseminating this information to you without making a determination that your business or organization is a small business as defined by Section 222 of the Small Business Regulatory Enforcement Fairness Act or related provisions.

Land and Chemicals Division

Type of Document:
- ☐ Termination of Order
- ☐ Notice of Violation and Inspection Report/Checklist
- ☐ No Violation Letter and Inspection Report/Checklist
- ☐ Letter of Acknowledgment
- ☐ Information Request
- ☒ Pre-Filing Notice and Opportunity to Confer
- ☐ State Notification of Enforcement Action
- ☐ Other Correspondence

Facility Name: Big River Zinc Corporation

Facility Location: 2401 Mississippi Avenue

City: Sauget **State:** Illinois

U.S. EPA ID#: ILD062444435

Assigned Staff: Todd Brown **Phone:** (312)886-6091

Name	Signature	Date
Author	Todd Brown	3/17/08
CS1 Section Chief	[signature]	3/18/08
Regional Counsel	Karen Peaceman	3/20/08
RCRA Branch Chief	Willie A. Harris	4/4/08

4-4-08

Directions/Request for Clerical Support:

After the Section Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
   - One copy for the assigned staff;
   - One copy for the section file;
   - One copy for the branch file; and
   - One copy for the official file copy.
3. Make any additional copies for cc=s or bcc=s.
4. Mail the original certified mail and distribute office copies and cc=s and bcc=s.

Once the certified mail receipt is returned:

5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

Todd Brown/R5/USEPA/US
04/03/2008 09:59 AM

To Dennis.McMurray@illinois.gov, Todd.Marvel@illinois.gov, William.Ingersoll@illinois.gov, Paul.Purseglove@illinois.gov
cc Mary Setnicar/R5/USEPA/US@EPA
bcc

Subject Enforcement Action Communication- Big River Zinc

This is to inform you that on April 4, 2008, U.S. EPA will send by certified mail, the attached Pre-filing and Opportunity to Confer notice to Big River Zinc Corporation, Sauget, IL. The alledged violations were found during U.S. EPA's September 19, 2007 compliance evaluation inspection of Big River Zinc Corporation.

Contact: Todd Brown, (312) 886-6091


BRZ OPTC.doc

Todd Brown/R5/USEPA/US
04/03/2008 10:40 AM

To Dennis.McMurray@illinois.gov, Todd.Marvel@illinois.gov, William.Ingersoll@illinois.gov, Paul.Purseglove@illinois.gov
cc Mary Setnicar/R5/USEPA/US@EPA
bcc

Subject Enforcement Action Communication- Big River Zinc

Correction. The letter will be issued on April 7.

This is to inform you that on April 4, 2008, U.S. EPA will send by certified mail, the attached Pre-filing and Opportunity to Confer notice to Big River Zinc Corporation , Sauget, IL. The alledged violations were found during U.S. EPA's September 19, 2007 compliance evaluation inspection of Big River Zinc Corporation.

Contact: Todd Brown, (312) 886-6091


BRZ OPTC.doc

2/13/08

BIG RIVER ZINC CORPORATION
2401 MISSISSIPPI AVENUE
SAUGET, ILLINOIS 62201-1078

TEL: 618-274-5000
FAX: 618-274-4444

Mr. Todd Brown
U. S. EPA Region 5
77 West Jackson Boulevard, LR-8J
Chicago, Illinois 60604

Mr. Brown

Please consider the attached documents as part of the response to the January 17, 2007 Notice of Violation received by Big River Zinc. In our letter of February 13, BRZ stated that the Contingency plan and the Training program would be revised and copies sent to EPA by March 31, 2008.

Please find included with this letter a copy of the former and revised Contingency plans. Areas of concern are highlighted in yellow in the former plan and clarifications in grey in the revised plan. The Revised contingency plan will be mailed by certified mail to the Sauget Police Department, The Sauget Fire Department, memorial Hospital, and the Local Emergency Planning Committee. The former plan was mailed in the same way and the certified mail cards are on record. In addition, each agency will be called personally.

The clarified training document is also included. BRZ is shut down and there is no workforce at present. When BRZ re starts, or if employees are recalled for short periods and will handle Hazardous Waste, the new training document and the revised contingency plan will be used for training.

Those individuals who have received training in Hazardous Waste Management and Hazardous Waste Transportation (whose certificates of completion were sent to you) will continue to receive that training annually.

Sincerely,

Michael A Altepeter
Environmental manager/Senior Process Engineer

BIG RIVER ZINC

HAZARDOUS WASTE (RCRA) TRAINING

TRAINING DOCUMENT

Big River Zinc generates more than 1000 Kg (2250lb.) of hazardous Waste per year. Therefore BRZ is classified as a large Quantity Generator. BRZ is required to conduct introductory and annual training. This is both the introductory and refresher training.

Who must be trained? (Why you are in this class)

You are here because you perform one or more of the following:

- Decide which waste is hazardous
- Add hazardous waste to accumulation containers at accumulation points
- Remove hazardous waste from accumulation containers
- Transport hazardous waste to or from accumulation points
- Respond to spills, fires, other emergencies involving hazardous waste
- Complete hazardous waste manifests or annual reports
- Inspect hazardous waste accumulation points
- Operate or work at accumulation points
- Conduct any tasks involving occupational exposure to, or which require management of, hazardous waste

Question: What do you do that involves Hazardous Waste?

Training frequency:

- Any employee of Big River Zinc who requires Hazardous Waste Training will be trained when they transfer to a job that fits the description above and once every calendar year they remain in a position that fits the description above.

Instructors

- Hazardous waste instructors must be trained outside the plant in Hazardous Waste Management, and/or Hazwopper. The Instructor must have a certificate that indicates the Training is in accordance with 40 CFR 265.16, name of the school sponsoring the training and signature of the instructor.

Characterization and Identification

Hazardous waste must be:

1. Solid Waste
2. Be specified as a listed Hazardous waste by EPA

3. Be characterized as Hazardous
   At BRZ this normally means it failed the TCLP test.

Question: Does anyone know what a TCLP test is or who does the TCLP test?

Time Limits

- BRZ is a large quantity generator. Hazardous waste cannot remain at BRZ for more than 90 days from the time it becomes waste and is deposited in the accumulation container.

Satellite accumulation points

- BRZ has satellite accumulation areas. They are:
  1. A steel drum for contaminated oil dry in the vehicle shop
  2. A steel drum for contaminated oil dry in the oil house
  3. A steel drum for contaminated oil dry by the fueling station
  4. A steel drum for contaminated parts cleaning station in the vehicle shop

- These are under the control of the operator in the area.
- The steel drums are compatible with the waste, that is, the waste will not corrode the container.
- The drums must be in good condition. They are regularly inspected, but if you see dents or leaks report the problem immediately.
- The containers are marked as Hazardous waste satellite accumulation containers. The label also says why it is hazardous waste.
- The drums must be sealed except when they are being filled.
- These satellite accumulation points have no time limit, BUT when the drum is full it must be shipped as hazardous waste within 90 days.

Question: What are you to do with used oil dry?
Question: What do you do if you open the drum at the oil house to put used oil dry in it and you find the drum is full?
Question: Why are the drums for parts cleaner and oil dry have special markings.
Question: Why do the drums have to be sealed all the time?

Accumulation Point

BRZ also has accumulation points for larger quantities of hazardous waste. Examples are press cloth, and construction debris.

- Hazardous waste will be stored in either SPECIAL Hazardous waste dumpsters or loaded from the point of origin directly into SPECIAL Hazardous Waste Dump Trucks. HAZARDOUS WASTE CAN ONLY BE DEPOSITIED IN SPECIALLY DESIGNATED DUMPSTERS OR TRUCKS. Regular trucks or dumpsters cannot be used for hazardous waste. Regular dumpsters for ordinary

trash are marked. These containers cannot leave BRZ unless the area superintendent certifies to security that they do not contain any Hazardous waste.

- The containers for hazardous waste must be specially marked. At BRZ the marking includes:
    1. HAZARDOUS WASTE
    2. Date the first waste was deposited into the container
    3. The last date the container must be shipped as hazardous waste
    4. Identification of the hazardous waste that can be placed into that particular container.
    5. If the Safety Department determines the waste is Flammable the container will be marked as such.
- All Dumpsters and trucks for hazardous waste must inspected upon arrival and be in good condition. They must remain in good condition. The container must be compatible with the waste. For example acid soaked absorbent pillows cannot go into a steel dumpster.
- They must be covered when not being filled. No waste can be outside the container.
- Containers must be handled in such a way that they do not rupture or leak. For example do not puncture a dumpster with a fork truck. No cutting torches, welders, gasoline, or diesel can be used or stored by a Hazardous waste container.
- Inspection
    1. All Hazardous waste sites and satellite containers will be inspected once a week by security, BUT if you see something out of place near a container report it. DON"T wait for someone else to do it.
    2. At BRZ all other waste containers will be inspected weekly to ensure no hazardous waste was placed in them. <u>If you have any doubts also what may be hazardous waste ask your supervisor, Safety, or Environmental Manager. Do not throw plant waste into a regular trash dumpster without asking.</u>
    3. At BRZ there are construction projects.

        -The contractors may use dumpsters and so on for waste. These must be labeled as belonging to the contractor. Each waste container MUST be marked as either Hazardous waste or regular construction waste.

        -If hazardous waste is generated, the hazardous waste must go into SPECIAL HAZARDOUS WASTE CONTAINERS. Hazardous waste containers will be marked manifested and shipped in accordance with regulations.

        -Regular waste can go into other containers: dumpsters, trucks, drums, or stored in piles. Any construction waste container or piled non hazardous waste is under the control of the Project Engineer. No waste container or truck connected with a project can leave the plant without the written approval of the Project Engineer, who certifies that the container has no hazardous waste.
- Transport and manifesting, Land disposal restrictions, record keeping

These functions are not covered in this class. The Environmental manager, the Security Supervisor, The Senior Security officer, and the Safety Director will receive training outside the plant to perform these functions.

Question: If you have to dispose of used press cloth, what would you do?
Question: What do you do with a clean up from the Cell House basement?
Question: You have just finished installing new pipe. The old pipe is coated with sulfate. What do you do with it?
Question: You notice the tarp has come loose from the press cloth dumpster. What shall you do?
Question: A contractor is at the gate with a dumpster of trash. You are the security officer. What do you do?

Hazardous Waste Emergency Procedures

Note: It is BRZ policy that employees are not permitted to respond to uncontrolled releases of hazardous material or, likely uncontrolled releases, or place themselves in danger during a major uncontrolled emergency situation such as a large fire, an explosion or series of explosions, or life threatening major spill or fume release.

The only releases that BRZ employees are allowed to respond to are those that are incidental where the substance can be absorbed, neutralized, or otherwise controlled at the time of release by employees in the immediate release area, or by maintenance personnel.

In the event of an uncontrolled release or release that is likely to become uncontrolled, use the evacuation procedure.

At BRZ, uncontrolled releases are not likely to result from hazardous waste. So use the following procedures unless personal safety is threatened as described in the preceding 3 paragraphs.

If you see a dangerous situation involving the area around hazardous waste containers or involving the Hazardous waste itself

1. Contact Security and your supervisor using the regular phone, a walkie talkie, or a cell phone, or go to the Security building. Security will contact the Emergency coordinator. The supervisor on duty will determine if the workers on site can handle the emergency or if outside help is needed. If personnel on site cannot handle the problem BECAUSE IT IS AN UNCONTROLLED RELEASE OR IS LIKELY TO BECOME AN UNCONTROLLED RELEASE, the supervisor will have Security contact the Fire Department or other emergency help as shown in the Contingency plan. Upon arrival, the Emergency Coordinator will assume control.
2. If the supervisor determines on site personnel can handle the problem safely, the supervisor will have workers don the needed protective gear and then commence operations.

3. Fire – Use the fire extinguishers or fire hoses to put out the fire. All Personnel are trained by Safety to use this equipment.
4. Spill – Use the absorbent pillows and mats contained in the spill kits located around the plant to prevent liquids from reaching the sewers or bare ground.
5. Clean up – All materials from a fire or spill and all absorbent materials as well as PPE will be bagged and tagged and placed in suitable Containers designated by the Emergency Coordinator until Suitable hazardous waste containers can be procures if needed. Sweeping using absorbent materials or vacuuming with HEPA filtration is preferred to prevent dusting of hazardous substances. Safety trains all personnel to use PPE properly.
6. Leaks to sewer or unpaved ground.
   --If any Hazardous waste leaks to a sewer, American Bottoms must be contacted immediately by the supervisor or Emergency Coordinator. American Bottoms will have to adjust their treatment system to remove the hazardous contaminants. Vacuum trucks will be used to clean the sewer if possible.
   --If any liquid hazardous waste leaks to unpaved ground, the unpaved spot where the leak entered will be dug up with earthmoving equipment kept on site until there is no visible sign of the waste. The ground will be tested to determine if all the contaminants have been removed.
7. Automatic Shut Off, automatic alarms
   All hazardous waste at BRZ is handled by personnel directly. Therefore, there are no automatic shut offs, no automatic alarms.
8. Shutdown of operations
   Operations may be shut down or curtailed if an emergency condition involving Hazardous waste either endangers personnel or if operating personnel are needed to remedy the emergency condition.

Question: If you saw that some empty cardboard boxes were piled against a hazardous waste dumpster, what would you do?
Question: If someone hit the solvent drum used for parts cleaning with a fork truck and it begins to leak what should you do?
Question: Who is in charge during an emergency situation involving hazardous waste?
Question: Will operations ever be shut down because of a fire near a hazardous waste container?
Question: When do you learn to use a fire extinguisher?

Training Documentation and records

Copies of all training documents will be kept in the Environmental manager's files and in Safety dept files, and on the Server. Please refer to the RCRA training document for a detailed description on training. As a minimum the program will document:

1. The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job.
2. A written job description for each position described above.

3. A written description of the type and amount (RCRA Training Document) of both introductory and continuing training that will be given to each person described above.
4. Training records detailing training given will be kept for at least three years from the date the employee last worked for the company.

Special BRZ Procedures.

Employees must comply with all procedures set forth in the memos in the Consolidated Waste Procedures and Records. These concern BRZ specifically.

This training also includes a tour of the Hazardous Waste Areas at BRZ.

Big River Zinc
2401 Mississippi Avenue
Sauget, IL 62201

To: All Employees
From: Environmental Manager
Date: May 27, 2005

Please lend your attention to the following matters because we are obligated by law through the Environmental Protection Agency to handle Hazardous Waste in a responsible manner.

Waste OIL

At this site, any spills of petroleum products or wastes like lubricating oils, motor oils, transmission fluid, gasoline, or diesel fuel may be Hazardous Waste because of possible contamination with metals. All these spills must be contained and cleaned up immediately. The cleaned up material including an adsorbent material will be tested to determine proper disposal method. The spill and cleanup must be reported to a supervisor and through the supervisor to the Environmental Manager.
The spill must be kept from reaching any sewer. Whatever material was used to soak up the waste, for example oil dry, sawdust, concentrate, calcine, ZSM, residue, sweeping compound, etc. **cannot be thrown away in the regular trash**. The oil houses and the vehicle shop have satellite accumulation points. They are labeled yellow plastic drums. Use these to contain used oil dry. The Environmental manager will decide the best disposal method for these materials based on characteristic testing.

Oil Spills
If any petroleum products or waste oil spills reaches a sewer in any part of the plant, the incident must be reported to your supervisor. Supervisors are to use all safe methods to **stop the leak** and do whatever they can to keep the material out of the sewer **first**. Please report the spill to the Environmental manager and/or American Bottoms treatment plant as soon as possible. If you are needed at the spill site, call Security on your radio and have Security report the spill. Whenever there is any sort of leak, please look around and find out if anything reached the sewer.
Security has the phone number of the American Bottoms Treatment Plant. If a spill is reported to the American Bottoms treatment plant, the Environmental Manager must also be notified at 194 or on his Cell Phone.

Regulated material spills

Any Cell Acid, Purified solution, ZSM, Arsenic, Copper Sulfate, Hydrochloric Acid, Caustic, Sulfuric Acid, Lime, Ammonium Chloride, Strontium carbonate, Copper cake, Cadmium sponge, spills must be reported to your supervisor. Supervisors are to use all safe methods to **stop the leak** and do whatever they can to keep the material out of the sewer **first**. Please report the spill to the Environmental manager and/or American Bottoms treatment plant as soon as possible. If you are needed at the spill site, call Security on your radio and have Security report the spill. Whenever there is any sort of leak, please look

around and find out if anything reached the sewer. Security has the phone number of the American Bottoms Treatment Plant. If a spill is reported to the American Bottoms treatment plant, the Environmental Manager must also be notified at 194 or on his Cell Phone.

Non hazardous Trash Containers

Any Cell Acid, Purified solution, ZSM, Arsenic, Copper Sulfate, Hydrochloric Acid, Caustic, Sulfuric Acid, Lime, Ammonium Chloride, Strontium carbonate, Copper cake, cadmium sponge, concentrate, residue, calcine, Zinc nuggets, cathodes, Zinc dust and so on CANNOT be thrown into a trash dumpster. Any petroleum products or wastes like lubricating oils, motor oils, transmission fluid, gasoline, diesel fuel and the like CANNOT be thrown into a trash dumpster. These are trash dumpsters **NOT hazardous waste containers**. It is a violation of the law to put anything but normal trash in the trash dumpsters.

Thank you for all your efforts.

Big River Zinc
2401 Mississippi Avenue
Sauget, IL 62201

Management of Waste Especially for Construction and Maintenance Projects

1. **No Hazardous Waste may ever leave this facility without proper testing and manifests in accord with EPA regulations.**

2. The Waste from any project at Big River Zinc that results in the accumulation of materials such as; soil, steel, fiberglass, petroleum products and residues, siding, bolts, rags, wood, brick, rubber liners, cardboard, pavement, etc will fall under this management procedure.

3. Inasmuch as possible, determine if the waste the project will produce is hazardous before the project begins so proper arrangements can be made for both holding the material on site and disposal of the material in accordance with EPA regulations. Please contact the Environmental Manager for aid in determining if the waste materials from your project are hazardous.

4. Non hazardous waste such as packaging for new parts, banding, pallets, and so on can be disposed of in the regular trash, however these wastes cannot be contaminated with process materials (concentrate, sulfates, slimes and so on.)

5. Scrap metal sold to a metal recycler is exempt from hazardous waste. However the metal must be cleaned of gross accumulations of sulfate, acid, residue, manganese slimes, calcine, etc before leaving a production area.

6. If testing (or generator knowledge) indicates waste products from a project are hazardous, a proper hazardous waste receptacle will be ordered to store the material during the life of the project. (Note; the hazardous waste cannot be held at BRZ more than 90 days). These receptacles (usually dumpsters, but barrels, etc are used at times) must be positioned so they cannot leak to the sewer system. The Environmental manager must approve placement of the receptacles (dumpsters and barrels).

7. When the hazardous container arrives it will be properly labeled with the accumulation date. It will be added to the rounds for weekly inspection.

8. Material such as soil, concrete, asphalt that prove to be hazardous waste but can be shipped by dump truck can be piled in an area approved by the Environmental Manager until they can be loaded for shipment. The pile must be cordoned off and labeled.

9. Some materials, which are not part of normal cleanup and reprocessing within the BRZ production system, can be recycled through the process to recover heat, metals, etc. An example is wood. It must be assumed that if they have enough value to BRZ that they are to be recycled they would be hazardous waste if they leave the plant. If a dumpster is the most convenient way to handle the material, then a hazardous waste dumpster must be used for the purpose. If the material is accumulated in a pile to be transferred with BRZ equipment, then the Environmental Manager must approve the area of accumulation.

10. Any third party dumpster or container used in this plant must be labeled. If it may contain hazardous waste, but testing is not complete, it must be labeled "Possible Hazardous Waste – Testing results due _____ - DO NOT REMOVE without written approval of *Name*." Where name is Supervisor or Engineer in charge of project.

EXCEPTION: In Fall 2007 the demolition of the Leach Building commenced. The contractor for this is Spiritas Wrecking. Spiritas supplies their own vehicles for disposal of Non Hazardous Waste and for metal recycling. There will be a special sign out sheet for Spiritas. The driver of each container or truck belonging to Spiritas that leaves the plant will sign a sheet for Spiritas that the material is Non Hazardous. The Supervisor will sign the same sheet Daily verifying that Spisitas did not haul any hazardous Waste out of BRZ. These Trucks and Dumpstaers will not be labeled as they belong to and are under the exclusive control of Spiritas. No other party will be allowed to use their dumpsters or vehicles.

11. If the container is not for Hazardous Waste, then it must be labeled. "NOT FOR HAZARDOUS WASTE – DO NOT REMOVE WITHOUT WRITTEN APPROVAL OF *Name*." Where name is the Chief of Security. The Chief of Security will obtain verification that the material in the container is Non Hazardous Waste from the Area Manager or Project Engineer before allowing the dumpster to leave the plant.

12. Any of the labels described above must be displayed on the container (dumpster) so Security can see them easily. Security is to stop any container with such a label if they have no written approval for it to leave the plant, and call the Environmental manager or Plant manager.

13. Security personnel will be trained to inspect the hazardous waste dumpsters, the regular trash dumpsters, and used oil collection points weekly.

14. Whenever a load of waste material (trash) leaves the plant, security personnel will inspect the contents. If there is material in the load, which does not appear to be normal trash, and there is no Hazardous Waste Manifest for that particular load, the truck will not be allowed to leave BRZ property until the Environmental Manager has been contacted and has made a determination of the proper course of action.

Instructions for Hazardous Waste Shipments

1. Upon determination of the need for a hazardous waste shipment.
   1.1. Determine whether there is a current profile for the hazardous waste
      1.1.1. If there is one available for this shipment use it
      1.1.2. If not send a sample of the waste to an EPA certified lab, and have the sample analyzed, usually a full TCLP analysis plus ph analysis. (If dealing with Clean management, Kevin Baker, or Heritage, Fred Davidson, they will have the waste tested and provide the profile (usually at no cost)).
      1.1.3. Contact broker or agency who will receive waste: [Currently Clean Management phone: (800) 538 8131)
      1.1.4. Obtain Hazardous Waste Manifest from broker or receiving company
2. Upon arrival of transport, weigh truck
3. Upon departure of truck:
   3.1. In coordination with driver weigh truck, make certain it is within DOT weight limits, that all the tarps lids, etc are secured properly, that the truck and container are clean and free of debris, mud, etc. and then fill out hazardous waste manifest.
   3.2. BRZ releaser print name and sign in block 15.
   3.3. Have driver fill in name and sign, block 17.
4. Make twp copies of the land disposal and restriction form for that waste stream and attaché one to the Generator retain copy , page 6 – last page; and the other to the rest of the copies that the driver takes with the load.
5. Hold file in working folder until receipt of copy from TSD showing receipt of shipment and certificate of disposal. If these are not received within 30 days contact the disposal site to get a copy. If one doesn't come contact EPA.
6. Hazardous Waste containers and consolidation areas must be labeled with signs, and inspected weekly by security.
7. Make out HAZARDOUS WASTE sticker showing start date for 90-day clock and place it onto the new container.
8. Log the shipment into the excel spread sheet for Hazardous Waste Shipments kept on the server under "Environmental Topics"

Attachment A:

Disposition of Hazardous Waste Manifest Copies For State of Michigan Manifests

Copy 1: Goes with the Driver and is forwarded to the destination State by the Disposal facility.

Copy 2: Goes with Driver and is forwarded to the generator State by the Disposal facility

Copy 3: Goes with the driver and is returned to the Generator to verify receipt of shipment by the Disposal facility.

Copy 4: Goes with the Driver and is the Disposal facility's retain copy.

Copy 5: Goes with the driver and is retained by the Transpost company.

Copy 6: BRZ Copy that remains here.

RCRA CONTINGENCY PLAN
AND EMERGENCY RESPONSE PROCEDURES

BIG RIVER ZINC CORPORATION
SAUGET, ILLINOIS

Revised September 21, 2005

TABLE OF CONTENTS

APPENDICES

1.0 INTRODUCTION

This RCRA Contingency Plan and associated Emergency Response Procedures (ERP) have been prepared for the Big River Zinc Corporation (BRZ) facility in Sauget, Illinois, in compliance with the requirements outlined in the U.S. Environmental Protection Agency (USEPA) rules and regulations for the Resource Conservation and Recovery Act (RCRA) - Hazardous Waste 40 CFR Part 264. Specifically, this document contains the requirements set forth by RCRA regarding a facility's Contingency Plan and Emergency Procedures for the accidental release of hazardous waste (40 CFR Part 264, Subpart D).

This Plan will be updated if the plan fails in an emergency, the facility changes in a way that increases the potential for fires, explosions, or releases of hazardous waste, or there is a change in the emergency coordinators or emergency equipment lists.

2.0 DESCRIPTION OF FACILITY

Big River Zinc Corporation (BRZ), Sauget, Illinois is engaged in the production of zinc. Sulfuric acid, copper cake, lead/silver concentrate, copper precipitate, and cadmium oxide are sold as by-products. The manufacturing process begins with fluid bed roasting of zinc sulfide concentrates. Sulfur dioxide is produced during the roasting process and is used to create sulfuric acid. The impure zinc oxide from the roaster is treated in several stages with sulfuric acid to leach out metals such as zinc, copper, cobalt, and cadmium. These metals are recovered and are sold as by-products to other industries, as is the lead and silver contained in the insoluble lead concentrate recovered from the leaching steps. The zinc goes through several additional steps and is recovered from solution by an electrowinning process. The sheets are washed and fed into an electric- induction-melting furnace. The zinc is then poured into a mold, cooled, and shipped to the customers.

The facility is located at Route 3 and Monsanto Ave., Sauget, Illinois (Figure 1). The facility has three production shifts. Facility personnel are on site 24 hours per day, 7 days per week. The facility property is oriented on a north-south axis and comprises 35.4 acres with approximately 60% of the property under roof or paved.

BRZ has one hazardous waste roll-off container, which is located west of the cadmium building. Filters containing metals are disposed of in the roll-off container. The roll-off is emptied at least every 90 days.

3.0. EMERGENCY REPORTING PROCEDURES

At all times, there is at least one employee at the facility or individuals who can be contacted with the responsibility for coordinating all internal emergency response measures at the facility. As required by federal regulations, the Emergency Coordinator (EC), or his alternate, is thoroughly familiar with all aspects of the ERP, all operations and activities at the facility, and the location of appropriate facility records. The EC and alternates may be reached through the security department.

3.1 Implementation of the Emergency Response Plan

The primary or the alternate Emergency Coordinators will decide which portions of this ERP are to be implemented following an evaluation of the site conditions. The basis of the EC's decision is his assessment of the magnitude of the emergency. The EC will determine if the emergency presents an actual or possible threat to human health and the environment, or if Big River Zinc personnel can control the situation.

Some types of emergencies that require full implementation of the ERP include:

- A fire that could spread off site;
- A fire that is too large to extinguish with a portable fire extinguisher;
- A spill or release of hazardous material that results in airborne constituents; and
- Uncontainable runoff due to a large fire, spill or release of material.

3.2 Internal Notification Procedures

Personnel

Upon discovering a situation that may represent an emergency, plant personnel will:

a. Report the situation to a supervisor immediately or call security if the supervisor cannot be found immediately; and

b. Verbally warn other personnel if the situation is an immediate threat to their safety.

Supervisor/Security

When notified of an emergency situation, the supervisor/security will:

a. Take necessary steps to prevent injury to personnel, damage to equipment, and any potential fire hazard; and

b. Contact the Emergency Coordinator or alternate.

Emergency Coordinator

The primary EC (or an alternate) will follow the procedures below in the event of a release, explosion, fire, or other emergency:

- Assess the situation and if warranted:

  Declare an emergency and notify all plant personnel with instructions by two-way radios. If there is a release, fire, or explosion that could threaten human health or environment outside the facility, the EC is to immediately declare an emergency.

  Notify security to call for police and/or fire department. The police or fire departments have the responsibility for coordinating outside response efforts. Telephone numbers of emergency response agencies are located in Section 3.3. A two-way radio connection is also available in the security office for contacting the police and fire departments.

- Commit and direct activities of any and all resources available that are necessary to carry out the ERP. The EC will focus on measures to eliminate potential harm to human health and the environment.

Whenever there is a release, fire, or explosion, the EC will act without delay to identify the character, exact source, amount, and aerial extent of the released materials. This may be accomplished by observation or review of facility records, manifests, and, if necessary, by chemical analysis. The EC will inspect for possible hazards to human health or the environment, both direct and indirect. This assessment will consider onsite and offsite effects as required.

Throughout the emergency, the EC will take measures, which are reasonable and necessary to ensure that fires and/or releases do not have an effect on any other substances at the facility.

3.3 Emergency Contact Phone List

Security	Ext. 110 (Internal Plant Phone) (618) 274-5000 ext. 110 (Outside Phone) Plant Radio

Primary Emergency Coordinator

Mike Altepeter	(618) 274-5000 Ext.194 (office) (314) 846-8093 (Home) (618) 410-8021 (cell)
Home Address	2936 Point Drive St. Louis, MO 63129

Alternate Emergency Coordinator

Anthony Thomas	(618) 274-5000 Ext. 198 (office) (618) 410-8020 (cell)

Second Alternate Emergency Coordinator

Steve Ash	(618 0 274 5000 ext 243 (office) (618) 410 4703 (cell)

Federal	National Response Center (Release of Hazardous Substances)	(800) 424-8802
	USEPA Region V	(312) 353-2000
State	Illinois Emergency Management Agency	(800) 782-7860

Local Emergency Response: Sauget Police, Fire, Ambulance 911

Local Emergency Planning Committee (LEPC) (618) 277-3012

Mr. Don Feher
Local Emergency Planning Committee
321 W. "F" Street
Belleville IL 62220-1193

Hospital

Memorial Hospital Emergency (618) 257-5840
Attn. Mr. Don Schneider
4500 Memorial Drive
Belleville, IL 62226

Contractor Support

Heritage Environmental Attn: Mr. Dan Hans 1188 Pershall Road Bellfountaine, MO 63137	(800) 388-3500
Onyx Industrial Services Fred Davidson 121 East Chain of Rocks Road Mitchell, IL 62040	(618) 931 0010
Bellon Environmental Company Bob Goodman 600 Fairview St. Louis, MO 63132	(314) 890 8600

Big River Zinc has discussed the contents of this plan, and has provided a copy of the plant location to the Sauget Fire and Police Departments, the LEPC, Heritage Environmental and Memorial Hospital.

3.4 Evacuation Plan

The EC will assist the fire department in determining the need for evacuation of the area surrounding the plant. This assessment is based on the EC's knowledge of the hazardous materials involved, the site conditions, and the current weather conditions. The role of the EC in this situation is an advisory one, and the decision to evacuate an area is the responsibility of the appropriate agencies.

The EC and alternates are responsible for the plant-wide evacuations only. Designated evacuation routes for plant personnel are displayed on Figure 2. Communication of evacuation to employees is by two-way radios, alarms, intercom, and other personnel to insure that all employees are informed and evacuated. The fire alarms are tested monthly to ensure they are in proper working condition. If an evacuation is ordered, plant personnel shall discontinue operation of all equipment and evacuate the area as soon as possible. Evacuation routes are determined according to the plant area affected.

Upon receiving instruction by two-way radio or by activation of an audible warning device, supervisors are to instruct employees to leave the facility according to their predetermined exit routes. The employees are to go to the designated assembly point, west of the facility, in the employee parking lot. Once the plant is evacuated, the supervisor of each area takes a prompt and accurate account of all personnel to ensure that everyone is accounted for.

The fire department is responsible for evacuation plans within the surrounding area and for coordinating local resources, including the police department and hospitals to assist in the implementation of the evacuation plan.

The EC, in consultation with the fire department and other local agencies, as necessary, will decide when reoccupation of the facility is possible. Only after following all the post-emergency procedures (see Section 5.0) can the facility resume operation.

3.5 Emergency Response Procedures

3.5.1 Fire and Explosion Emergency Response

An employee, upon detecting a fire or imminent explosion in the facility, will initiate the following actions:

- Use hand-held fire extinguishers to control or extinguish the fire if the fire is in an initial, controllable stage and no potential for imminent explosion exists.
- Contact his supervisor or security. Security will locate the EC and inform him of the fire and its location. Activate the alarm system. The supervisor will begin response preparation.
- Upon receiving available information, the EC or security will call the fire department to inform them of the situation and receive instruction.

After following the steps outlined above for emergency situations, the EC or, in his absence, the supervisor, must do the following:

- Take action to shut off electrical power and any gas in the vicinity of the fire location. Stop process and/or operations that may interfere with the emergency response actions;
- Take action, if necessary and safe to do so, to place absorbent materials around drains to prevent spilled hazardous waste from entering the sewer system;
- Notify all unauthorized personnel to vacate the area per evacuation plans; and
- Follow any instruction given by the fire department.

In addition, the EC must also:

- Note the current weather conditions and estimate the current wind direction and speed;
- Identify the character, source, amount, and aerial extent of any released hazardous materials by observation and review of facility records, manifests, and, if necessary, by chemical analysis; and

- Determine if the situation necessitates complete evacuation of the plant site. Furthermore, the EC will assist the Fire Department in their decision to evacuate the surrounding area.

If the situation meets the criteria for full implementation, at the first opportunity, the EC shall report the emergency to the National Response Center **(800-424-8802)** and the Illinois Emergency Management Agency **(800-782-7860)**. This verbal report includes:

- Name, address, and telephone number of the reporter;
- Name and address of the facility;
- Time and type of incident;
- Name and reportable quantity of material involved to the extent known;
- Extent of injuries, if any; and
- Possible hazards offsite to human health and the environment.

3.5.2 Spill Emergency Response

Any employee discovering a hazardous waste spill is to immediately notify his supervisor or security. Security will notify the EC or alternate. The EC will assess the situation and act as follows:

- Clear the area of unauthorized personnel. Stop process and/or operations that may interfere with the emergency response;
- Identify the source or cause of the release material and obtain a Material Safety Data Sheet(s) (MSDS). Use MSDS information to guide response and determine personal protective equipment (PPE) required;
- Direct trained personnel to don the appropriate PPE, as used in normal job duties, and re-containerize the spilled material;
- Alert local authorities if material may reach outside facility property;
- Rope off and/or barricade the area to prevent entry of unauthorized personnel;
- Take measures to contain the spill;
- Direct cleanup so that all hazardous materials are placed in properly labeled containers;

- Ensure that spill material, water, and adsorbents are placed in Department of Transportation (DOT) approved containers for ultimate disposal; and

- Insure that no incompatible wastes are stored within the spill area until cleanup is complete.

4.0 RELEASE REPORTING REQUIREMENTS

4.1 General

In the event of external release of a hazardous material, the procedures outlined in Section 3.0 will be followed. Prior to contacting state and local agencies, the EC will gather as much information about the incident as quickly as possible. The concerned agencies will then be contacted with initial information. The appropriate agencies will be kept informed of any new, additional, or changed information regarding the incident.

4.2 Release of RCRA Hazardous Waste

In case of a fire, explosion, or release of hazardous waste (equal to or greater than the reportable quantity for the material), as defined under RCRA (40 CFR, Section 261) which could threaten human health or the environment outside the facility, concerned agencies will be contacted as soon as possible by the EC. If the evacuation of surrounding areas may be required, local emergency response teams will be alerted. The following agencies will be contacted by the EC:

Federal	National Response Center	(800) 424-8802
	USEPA Region V	(312) 353-2000
State	Illinois Emergency Management Agency	(800) 782-7860
Local	Sauget Fire, Police, Ambulance	911
	Mr. Don Feher Local Emergency Planning Committee (LEPC) 321 W. "F" Street Belleville, IL 62220-1193	(618) 277-3012

Contractor Support:

Heritage Environmental Attn. Mr. Dan Hans 1188 Pershall Road Bellfountaine, MO 63137	(800) 377-2440

Or

Onyx Industrial Services Fred Davidson 121 East Chain-of-Rocks Road Mitchell, IL 62040	(618) 931 0010

5.0 POST-EMERGENCY PROCEDURES

When the emergency is contained, and a threat to human health and the environment no longer exists, the EC will take the following post-emergency actions:

- Decontamination/cleanup;
- Waste management;
- Post-emergency reporting; and
- Post-emergency assessment.

5.1 Decontamination/Cleanup

All of the equipment used in the emergency response procedures will be either decontaminated or properly containerized for disposal. Any non-emergency response equipment, such as materials or machinery, also affected by the emergency response will be decontaminated or disposed. The EC is responsible for arranging immediate replacement of any spent emergency response materials.

5.2 Waste Management

Waste residual materials, along with emergency response equipment needing disposal, will be collected and containerized in accordance with applicable regulations governing the management of such materials. Once all hazardous material is properly containerized, storage and disposal will be conducted according to applicable regulations.

5.3 Post-Emergency Reporting

The EC is responsible for ensuring the preparation and submittal of all required reports. A release, fire or explosion requires a written report to the USEPA Region V within 15 days of the event and the IEPA upon request only. The report will include:

- Name, address, and telephone number of the facility;
- USEPA identification number for the site;
- Date, time, and type of incident (e.g., fire, spill, etc.);
- Name and quantity of material(s) involved;
- Extent of injuries, if any;

- Assessment of any actual or potential hazards to human health or the environment;
- Procedures followed to reduce and remove released materials;
- Estimated quantity and disposition of the recovered material that resulted from the incident;
- Corrective measures taken;
- Whether an evacuation was required; and
- Name of individuals who have also been contacted or notified.

5.4 Post-Emergency Assessment

After the emergency episode, the EC will determine the causes of the emergency and analyze the effectiveness of emergency response procedures. The ERP will be modified if it is determined that procedures are inadequate or ineffective. If equipment capabilities are found unacceptable, necessary improvements will be made.

6.0 EMERGENCY EQUIPMENT

6.1 Communication Systems

Four different communication systems are available in the case of an emergency. They are described below.

Type	Description	Inspection Required
Two-Way Radios	The base station for the two-way radios is located in the main Security Office at the main gatehouse. Six two-way radios are located in the security department. Each of the four departments has a minimum of two radios that are normally carried by the supervisors. Many of the operators also have two-way radios. Fourteen radios are assigned to maintenance supervisors and the "rotating shift" electrician and mechanic. Two-way radio communications with the police and fire departments of Sauget is available to security. A weather monitor is available 24-hours per day in case of a weather emergency.	Radios are in use daily so any problems with the system or individual radios would be detected immediately.
Telephones	There are three lines into the Security Office. Telephones are located in all supervisors offices, all control rooms, all administrative offices, and in various maintenance areas. Inner plant phones do not have access to outside lines so security must be called in case of emergency.	Telephones are in use daily so any problems would be detected immediately.
Cell Phones	There are 19 Cell Phones issued to Key company management personnel. These can be used to contact people needed while outside or inside the plant. The cell phones can be used as normal phone or "walkie talkie" mode.	The cell phones are in use daily so any problems would be detected immediately.
Message Center Operations	A continuing liaison can be maintained through the Security Office for needed information by using the telephone communications. However, emergency communications would generally be handled through the two-way radios and Cell Phones for faster response time.	N/A

6.2 Fire Equipment

Fire response equipment is located throughout the facility. This includes sprinkler systems, hand held fire extinguishers, and fire equipment boxes.

A smoke detection system is located in the computer room on the bottom floor of the administrative building and in the Safety Office. These systems sound in the main security office when activated. Five automatic deluge sprinkler systems are located throughout the plant. These systems and the twelve fire hydrants are supplied with water under pressure through the fire protection pump. An alarm siren and warning light are located on the outside of the building to alert personnel that the system is in use. The sprinkler systems are checked once a month by the maintenance department.

A list of the location and contents of the hand held fire extinguishers is located in Table 1 of Appendix B. The department supervisors inspect the extinguishers on a weekly basis. Documented inspections of the fire extinguishers are located in the safety department. In other areas, a designated person inspects the extinguishers on a monthly basis. Fire extinguisher training is held annually for all employees. No employees are trained when hired.

There are seven fire equipment boxes located throughout the facility. A list of these locations and contents of the boxes are provided in Table 2 of Appendix B. The boxes are inspected on a monthly basis by the security department.

6.3 Personnel Protective Equipment

In case of a release, fire, or explosion, goggles, face shields, respiratory protection, full body acid suits, and barrier cream are available from the Safety Department. Rubber dielectric boots, heavy-duty rubber gloves, neoprene gloves, vinyl and latex gloves, and Tyvek disposable clothing are available from the storeroom.

6.4 First Aid

Stretchers are available in the foreman's office of every department. Safety showers are located at various locations in each department. Stokes basket and confined space rescue equipment are stored in the respirator room.

6.5 Spill Response Kits

Spill response kits containing appropriate tools and sorbent materials are located throughout the facility. A list of the spill kits and their locations are presented in Table 3 of Appendix B.

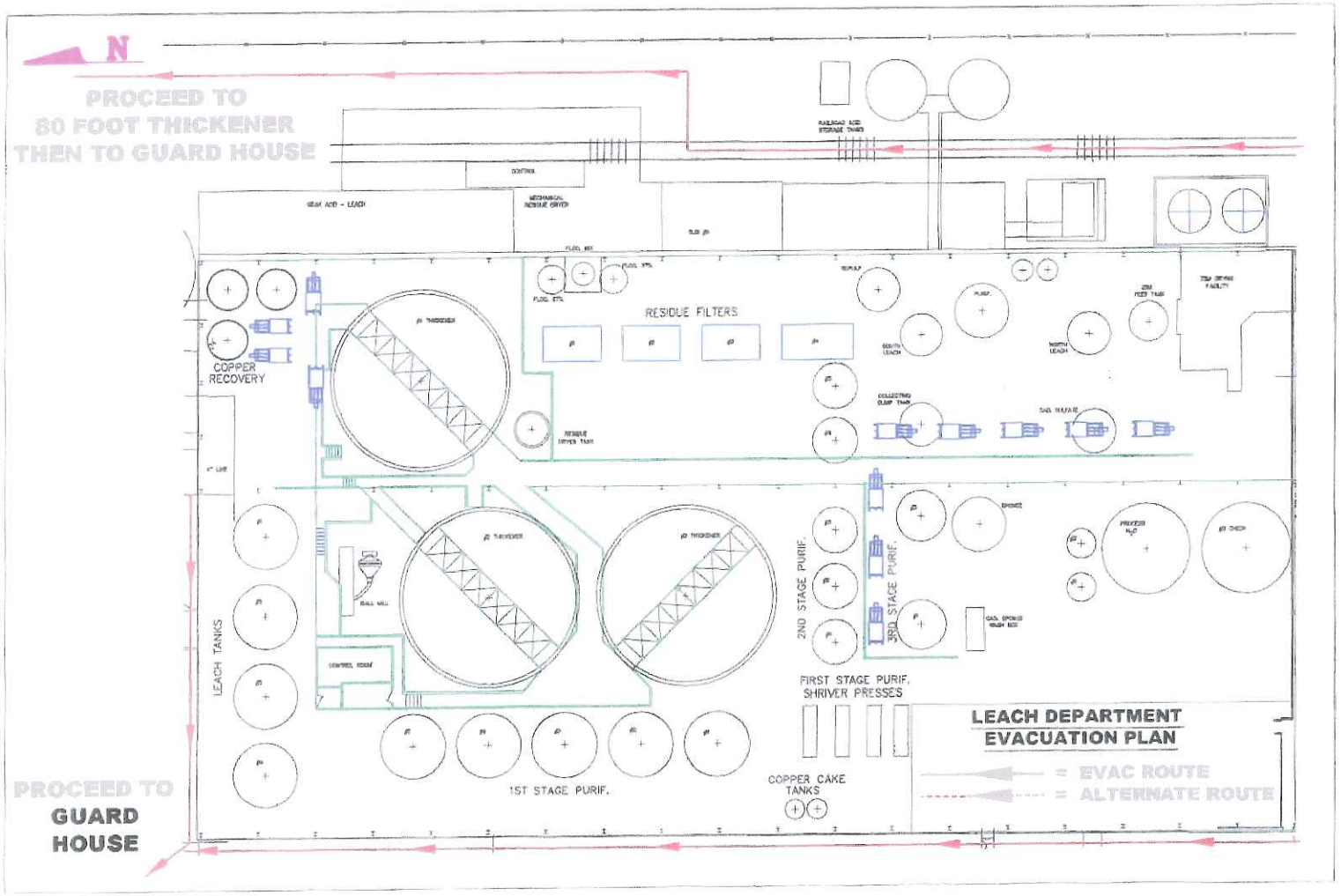
7.0 Training

The details of the training program for personnel involved in contingencies involving hazardous waste will be kept in the Safety department. Copies of the training will also be kept in the Environmental manager's files. As a minimum the program will document:

a. The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job.
b. A written job description for each position described above.
c. A written description of the type and amount of both introductory and continuing training that will be given to each person described above.
d. Training records detailing training given will be kept for at least three years from the date the employee last worked for the company.

APPENDIX A

FACILITY SITE DIAGRAMS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3RD STAGE PURIF.
FIRST STAGE PURIF.
SHRIVER PRESSES
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= ALTERNATE ROUTE
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GUARD
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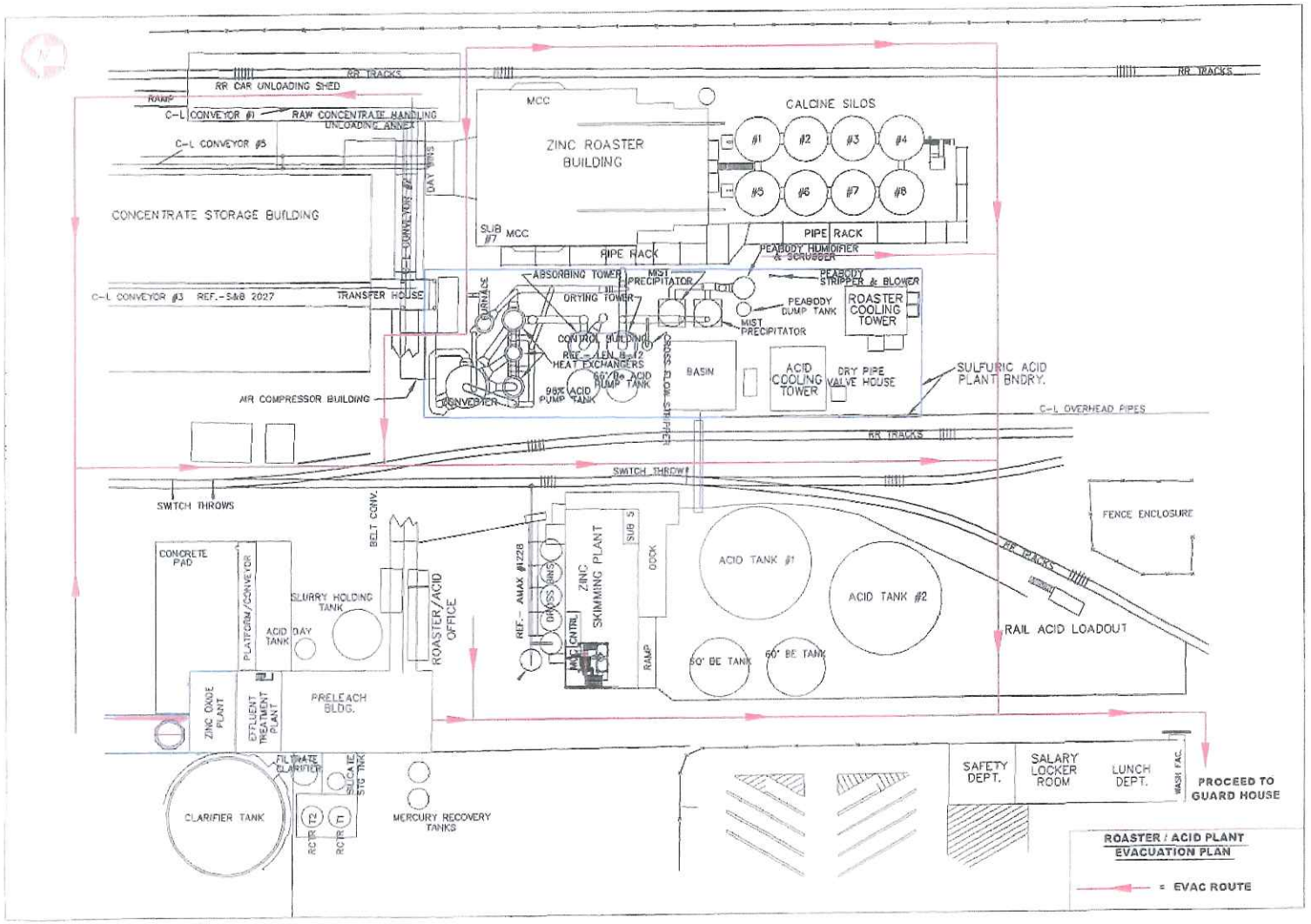
RR TRACKS
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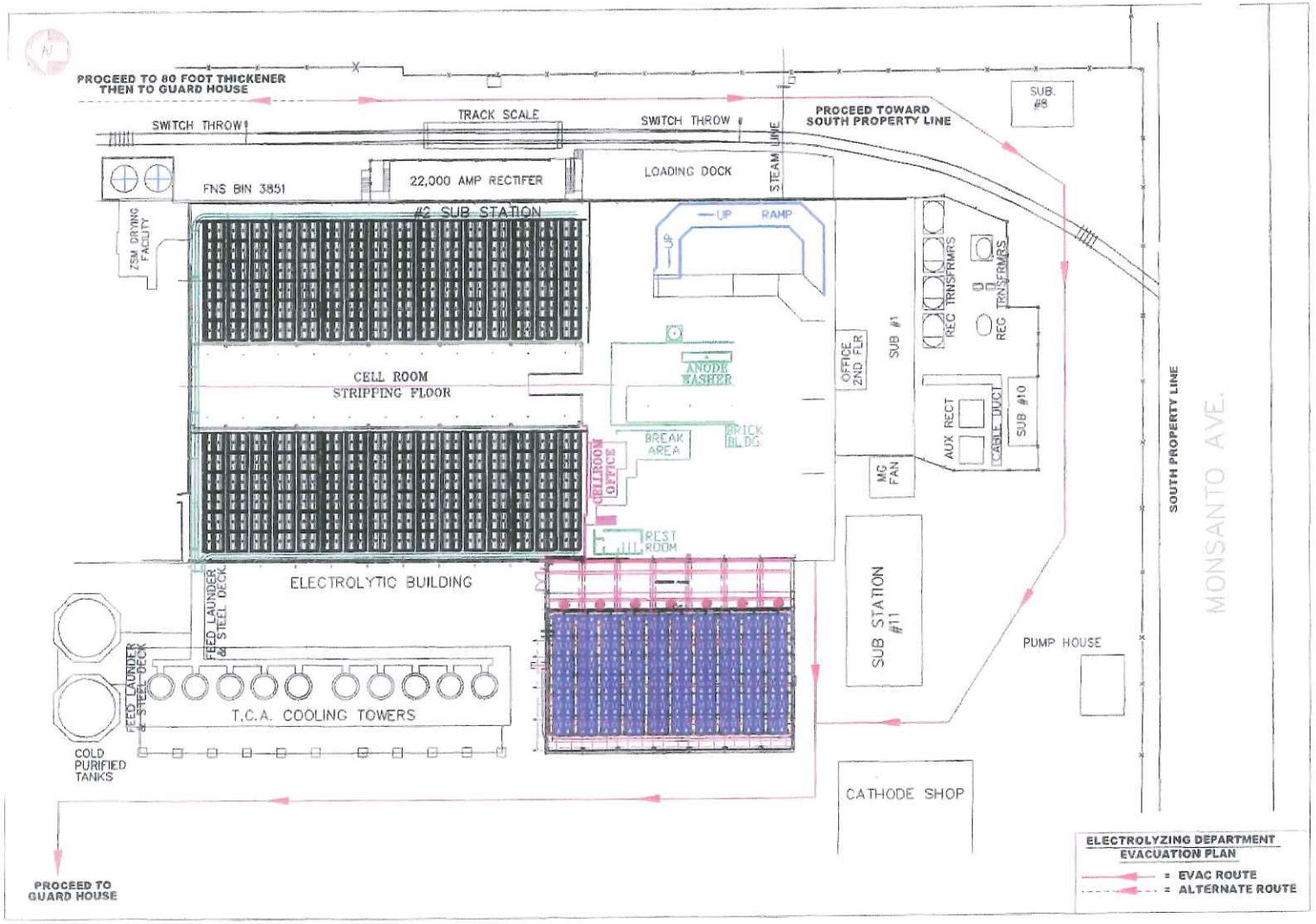
RAMP
C-L CONVEYOR #1
RAW CONCENTRATE HANDLING UNLOADING ANNEX
C-L CONVEYOR #5
CONCENTRATE STORAGE BUILDING
C-L CONVEYOR #2
DAY BINS
MCC
ZINC ROASTER BUILDING
CALCINE SILOS
#1
#2
#3
#4
#5
#6
#7
#8
SUB #7 MCC
PIPE RACK
PEABODY HUMIDIFIER & SCRUBBER
C-L CONVEYOR #3 REF.-S&B 2027
TRANSFER HOUSE
ABSORBING TOWER
MIST PRECIPITATOR
PEABODY STRIPPER & BLOWER
DRYING TOWER
PEABODY DUMP TANK
ROASTER COOLING TOWER
MIST PRECIPITATOR
CONTROL BUILDING
REF.-ALEN B-12
HEAT EXCHANGERS
CROSS FLOW STRIPPER
BASIN
ACID COOLING TOWER
DRY PIPE VALVE HOUSE
SULFURIC ACID PLANT BNDRY.
60% Be ACID PUMP TANK
98% ACID PUMP TANK
AIR COMPRESSOR BUILDING
C-L OVERHEAD PIPES
SWITCH THROWS
BELT CONV.
CONCRETE PAD
PLATFORM/CONVEYOR
SLURRY HOLDING TANK
ACID DAY TANK
ROASTER/ACID OFFICE
REF.- AMAX #1228
GLASS SHED
CONTROL
ZINC SKIMMING PLANT
SUB 5
DOCK
RAMP
ACID TANK #1
ACID TANK #2
60° BE TANK
60° BE TANK
FENCE ENCLOSURE
RAIL ACID LOADOUT
ZINC OXIDE PLANT
EFFLUENT TREATMENT PLANT
PRELEACH BLDG.
FILTRATE CLARIFIER
SLICATE STG TANK
CLARIFIER TANK
RCTR (2)
RCTR (1)
MERCURY RECOVERY TANKS
SAFETY DEPT.
SALARY LOCKER ROOM
LUNCH DEPT.
WASH FAC.
PROCEED TO GUARD HOUSE
ROASTER / ACID PLANT
EVACUATION PLAN
= EVAC ROUTE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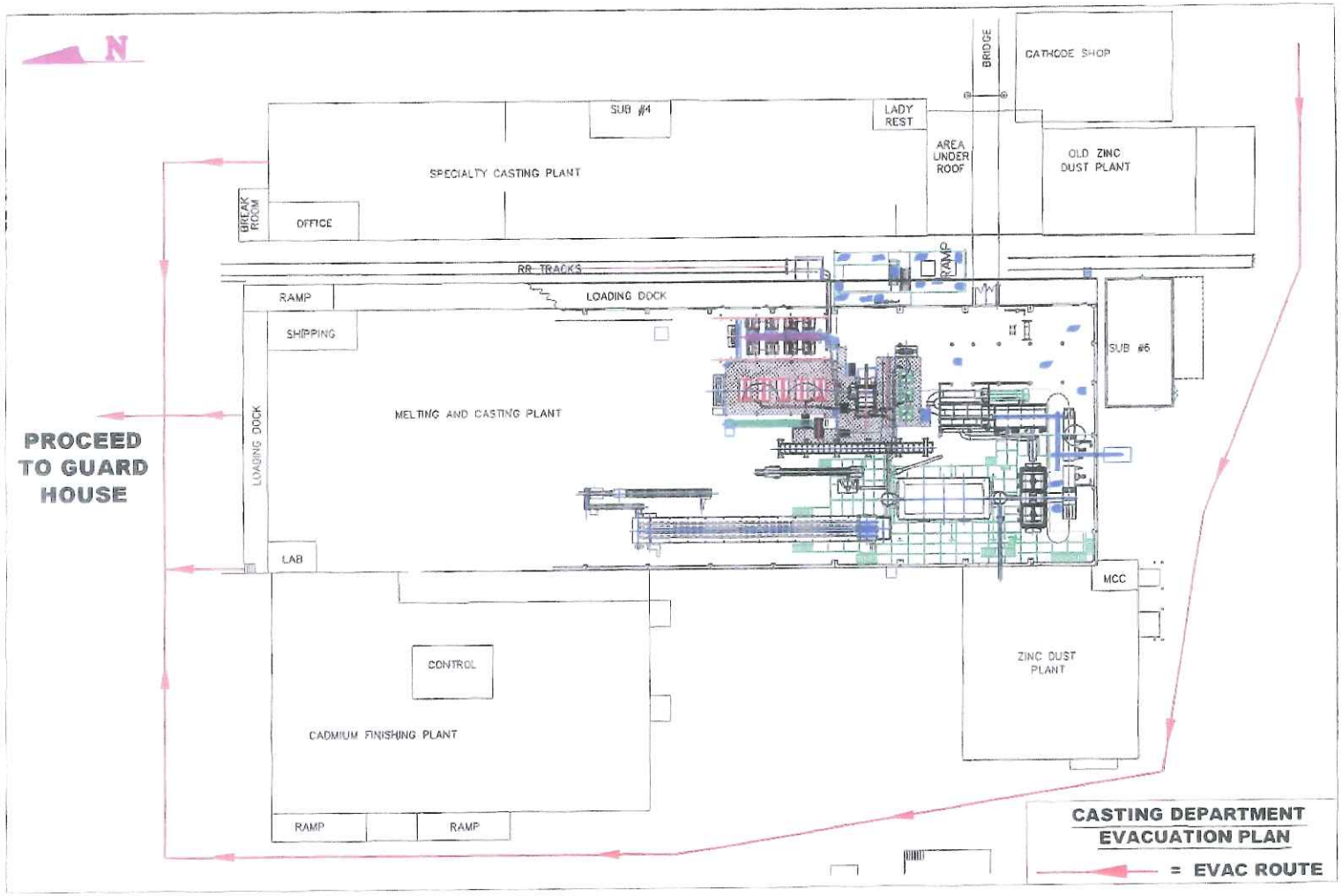
STEAM LINE
FNS BIN 3851
22,000 AMP RECTIFER
LOADING DOCK
#2 SUB STATION
ZSM DRYING FACILITY
UP RAMP
UP
REC TRNSFRMRS
REG TRNSFRMRS
CELL ROOM
STRIPPING FLOOR
ANODE WASHER
OFFICE 2ND FLR
SUB #1
AUX RECT
CABLE DUCT
SUB #10
BREAK AREA
BRICK BLDG
MG FAN
CELLROOM OFFICE
REST ROOM
ELECTROLYTIC BUILDING
FEED LAUNDER & STEEL DECK
SUB STATION #11
PUMP HOUSE
SOUTH PROPERTY LINE
MONSANTO AVE.
T.C.A. COOLING TOWERS
COLD PURIFIED TANKS
CATHODE SHOP
PROCEED TO GUARD HOUSE
ELECTROLYZING DEPARTMENT
EVACUATION PLAN
= EVAC ROUTE
= ALTERNATE ROUTE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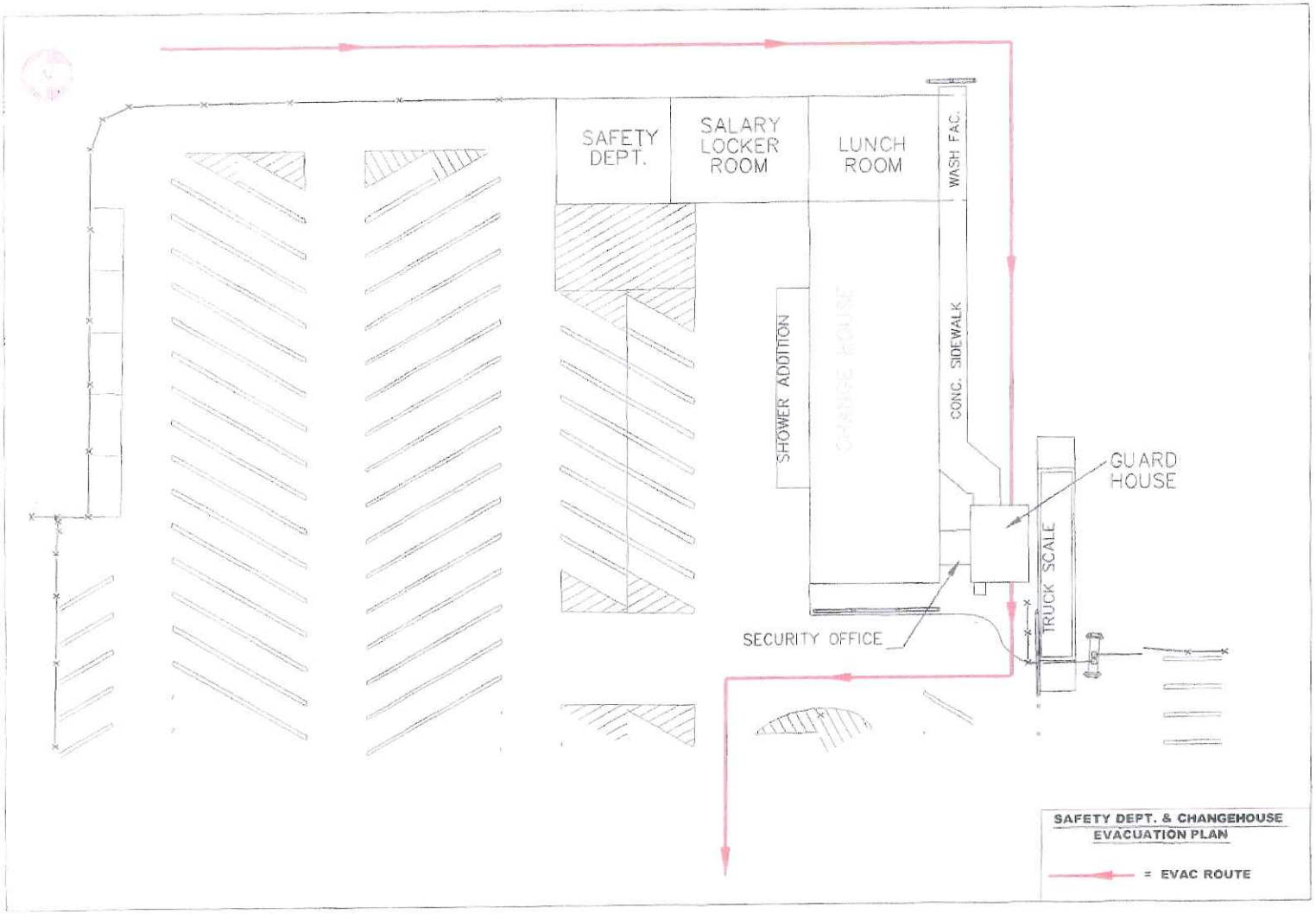
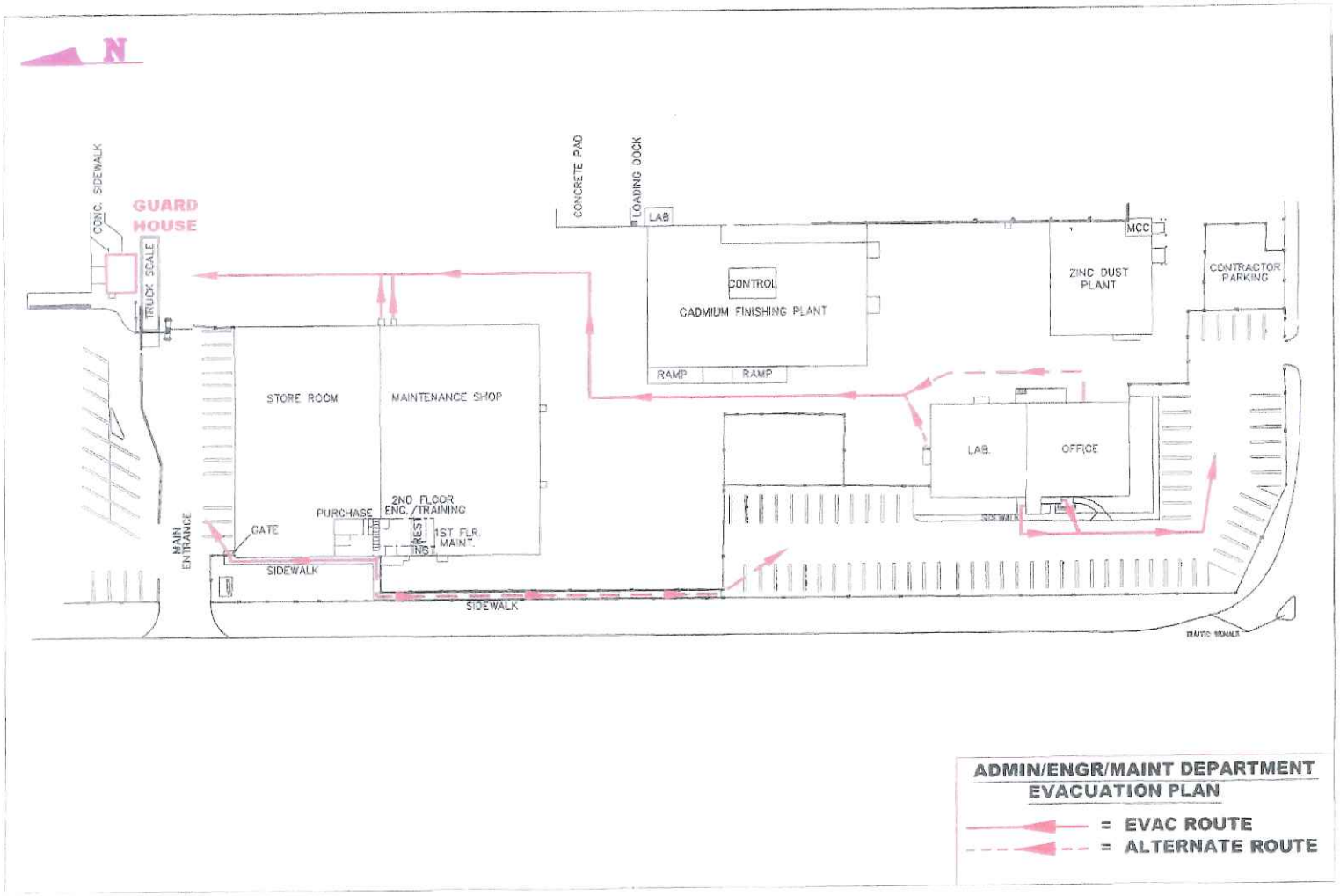
CATHODE SHOP
SUB #4
LADY REST
AREA UNDER ROOF
OLD ZINC DUST PLANT
SPECIALTY CASTING PLANT
BREAK ROOM
OFFICE
RR TRACKS
RAMP
LOADING DOCK
RAMP
SHIPPING
SUB #6
MELTING AND CASTING PLANT
LOADING DOCK
PROCEED TO GUARD HOUSE
LAB
MCC
CONTROL
ZINC DUST PLANT
CADMIUM FINISHING PLANT
RAMP
RAMP
CASTING DEPARTMENT
EVACUATION PLAN
= EVAC ROUTE


SAFETY DEPT.
SALARY LOCKER ROOM
LUNCH ROOM
WASH FAC.
SHOWER ADDITION
CHANGE HOUSE
CONC. SIDEWALK
GUARD HOUSE
TRUCK SCALE
SECURITY OFFICE
SAFETY DEPT. & CHANGEHOUSE
EVACUATION PLAN
= EVAC ROUTE


N
CONC. SIDEWALK
GUARD HOUSE
TRUCK SCALE
CONCRETE PAD
LOADING DOCK
LAB
MCC
CONTROL
CADMIUM FINISHING PLANT
ZINC DUST PLANT
CONTRACTOR PARKING
RAMP
RAMP
STORE ROOM
MAINTENANCE SHOP
LAB.
OFFICE
PURCHASE
2ND FLOOR ENG./TRAINING
REST
INST
1ST FLR. MAINT.
GATE
MAIN ENTRANCE
SIDEWALK
SIDEWALK
SIDEWALK
TRAFFIC SIGNALS
ADMIN/ENGR/MAINT DEPARTMENT
EVACUATION PLAN
= EVAC ROUTE
= ALTERNATE ROUTE

APPENDIX B

EQUIPMENT TABLES

Table 1
Location and Content of Fire Equipment Boxes
Big River Zinc Corporation
Sauget, Illinois

Box Number	Location
A	South of main Casting Dept. - East of the South Contracting Gate
B	South of the Vehicle Shop along the West fence line
C	East of Cell room along East fence line
D	East of Leach/Purification along East fence line
E	East of the Specialty Casting Building - West of Cell room Unit #3
F	At the Oil House
G	Northwest of the Acid Plant Converter, by the railroad tracks

Contents of Fire Equipment Boxes

QUANTITY	ITEM	DESCRIPTION/USE
One	1 1/2 in. Nozzle	Combination, Adjusts to fog or straight stream
One	Reducer	To reduce hydrant outlet to the fire hose (2 1/2 in. down to 1 1/2 in.)
Two	Universal Spanner Wrenches	Cast aluminum 'C' shaped wrench. Use to tighten reducer to hydrant and to connect fire hoses.
One	Hydrant Wrench	Adjustable combination hydrant and spanner wrench to be used to open the hydrant by turning the top post.
Three	Fire Hoses	50 foot sections of 1 1/2 in. industrial strength fire hose
One	Axe	Wood handle fireman axe

Table 2
Spill Response Kit Locations and Contents
Big River Zinc Corporation
Sauget, Illinois

Spill Kit #	Name of SPCC Area	Location Description	Contents Code
1	Drum Storage Area # 2	Roaster Mechanics area outside the south outer wall	1
2	#5 Substation-pad mounted transformer	Inside doorway, SE corner of skimmings plant	1
3	Waste Oil # 2	Outside the NW corner of the oil house	1
4	Diesel & Gasoline dispensing area	Above ground tanks, located west of RR tracks and S of cafeteria	1
5	Waste Oil # 1	Outside of building at the SW corner of the vehicle shop	1
6	Substation # 13A & 13B Pad mounted transformer	Substation located N of special casting & S of the purified storage tanks	1
7	# 4 Substation transformer	Inside E wall of the special casting bldg. N of the T-metal furnace	1
8	Substation # 6, 6A & 6B, Pad mounted transformer	S end of the main casting bldg. Inside the fenced area of the transformer yard	1
9	Substation # 11, Pad mounted transformer	S of cell room unit # 3	1
10	Satellite Kerosene storage tank (winter only)	Outside SE corner of the Quonset storage	1
11	Substation # 1, Pad mounted transformer	Fenced transformer area, south end of cell room	1
12	Substation # 2, Pad mounted transformer	SE corner of fenced transformer yard, S end of cell room	1
13	Substation # 9, Pad mounted transformer	E side of ground level L/P, south of residue loading	1
14	Hazardous waste storage	N of leach bldg. W Cd storage building	2

Contents Code	1	2
	6 ea. 3'x10' socks 4 ea. Absorbent Pillows 75 ea. Absorbent mats 10 ea. Disposable Bags/ties	Shovels, push brooms, and 15 lb fire extinguisher located in Leach Building. 20 lb CO fire extinguisher to be installed in Cd storage building by Sep 1, 2005.

Table 3
Fire Extinguisher Locations
Big River Zinc Corporation
Sauget, Illinois

DEPARTMENT	LOCATION	Location 2	BRZ #	B/C UNIT	B/C SITE	TYPE	
Admin Bldg	SE Entry			3ZHFC	3ZHFD	20 lb ABC DRY CHEM	
Admin Bldg	O/S Accounting			3ZHFR	3ZHFS	20 lb ABC DRY CHEM Cart-Op	
Admin bldg	Sample Room			3ZHGO	3ZHG1	20 lb BC DRY CHEM Cart-OP	
Admin Bldg	Lobby			3ZHFF	3ZHFG	5 lb ABC DRY CHEM	
Admin Bldg	East Hallway	By Judy Tilk's office					
Admin Bldg	Basement Break room			3ZHFW	3ZHFX	5 lb ABC DRY CHEM Cart-OP	
Admin Bldg	Lab 1 East			3ZHG2	3ZHG3	5 lb ABC DRY CHEM Cart-Op	
Admin Bldg	Lab 2 East			3ZHG4	3ZHG5	5 lb ABC DRY CHEM Cart-Op	
Admin Bldg	Computer Room			3ZHFH	3ZHFJ	17 lb Halon 1211	
Admin Bldg	Computer Room			3ZHFK	3ZHFL	17 lb Halon 1211	
Admin Bldg	Computer Room			3ZHFM	3ZHFN	17 lb Halon 1211	
Admin Bldg	Computer Room			3ZHFP	3ZHFQ	17 lb Halon 1211	
Admin Blding	Mail Room			3ZHFT	3ZHFV	15 lb Carbon Dioxide	
Admin Blding	Lab 1 West		Q41	3ZHFY	3ZHFZ	15 lb Carbon Dioxide	
Casting	@ Furnace	Under Baghouse	C7	3ZHGJ	3ZHGK	10 lb Carbon Dioxide	
Casting	Skimming - Platform	Skimmings Downstairs	C33	3ZHF7	3ZHF8	15 lb Carbon Dioxide	
Casting	Skimming- Platform	Skimmings Upstairs	C34	3ZHF9	3ZHFB	15 lb Carbon Dioxide	
Casting	Electric Room 1	Zn Dust MCC North	C11	3ZHGX	3ZHGY	15 lb Carbon Dioxide	
Casting	Electric Room 2	Zn Dust MCC West	C12	3ZHGZ	3ZHHO	15 lb Carbon Dioxide	
Casting	Ship Office	Outside foremans office ?		3ZHG6	3ZHG7	20 lb Carbon Dioxide	
Casting	Electric Room	MCC North	C9	3ZHGN	3ZHGP	20 lb Carbon Dioxide	
Casting	Cadmium	Cd West Basement Wall	C31	3ZHHC	3ZHHD	20 lb Carbon Dioxide	
Casting	East Building Platform	Die Cast Up	C24	3ZHJ2	3ZHJ3	20 lb Carbon Dioxide	
Casting	Back Dr E maint	West Wall		3ZHJD	3ZHJF	20 lb Carbon Dioxide	
Casting	Center Fl	Cathode Floor	C10	3ZHGV	3ZHGW	10 lb ABC Dry Chem	
Casting	East Building North Door	Die cast North end	C26	3ZHHT	3ZHHV	20 lb ABC DRY CHEM	
Casting	New Sub Station	East	C36	3ZHMR	3ZHMS	20 lb ABC DRY CHEM	
Casting	Ship Office	Foremans Office	C1	3ZHG8	3ZHG9	20 lb ABC DRY CHEM Cart-Op	
Casting	Ship Office	O/S Metal Analyzing room	C2	3ZHGB	3ZHGC	20 lb ABC DRY CHEM Cart-OP	
Casting	By Scale	East Middle	C3	3ZHGD	3ZHGF	20 lb ABC DRY CHEM Cart-Op	
Casting	SE corner	South East Corner	C6	3ZHGG	3ZHGH	20 lb ABC DRY CHEM Cart-Op	
Casting	West wall	West Middle	C5	3ZHGQ	3ZHGR	20 lb ABC DRY CHEM Cart-Op	
Casting	North end	M/L holding Conveyor	C4	3ZHGS	3ZHGT	20 lb ABC DRY CHEM Cart-Op	
Casting	Dust Hopper	Zn Dust East wall	C13	3ZHH7	3ZHH8	20 lb ABC DRY CHEM Cart-Op	
Casting	Cadmium	Cd south basement wall	C30	3ZHHF	3ZHHG	20 lb ABC DRY CHEM Cart-Op	
Casting	Cadmium	Cd oxide room basement	C29	3ZHHH	3ZHHJ	20 lb ABC DRY CHEM Cart-Op	

Table 3
Fire Extinguisher Locations
Big River Zinc Corporation
Sauget, Illinois

DEPARTMENT	LOCATION	Location 2	BRZ #	B/C UNIT	B/C SITE	TYPE	
Casting	Cadmium office	Cd office	C28	3ZHHK	3ZHHL	20 lb ABC DRY CHEM Cart-Op	
Casting	By W Ramp	Cd west door	C32	3ZHHM	3ZHHN	20 lb ABC DRY CHEM Cart-Op	
Casting	Center Wall	Zn Dust Baghoust	C17	3ZHHP	3ZHHQ	20 Lb ABC DRY CHEM Cart-Op	
Casting	East Bldg Center Hoist	T Metal pin press	C35	3ZHHW	3ZHHX	20 lb ABC DRY CHEM Cart-Op	
Casting	East Bldg S Dr	Die Cast down	C23	3ZHJO	3ZHJ1	20 lb ABC DRY CHEM Cart-Op	
Casting	Maintenance Warehouse	Old Zn dust 2nd floor E	C20	3ZHJG	3ZHJH	20 lb ABC DRY CHEM Cart-Op	
Casting	Maintenance 2nd Level	Old Zn dust 2nd floor N	C21	3ZHJL	3ZHJM	20 lb ABC DRY CHEM Cart-Op	
Casting	3rd Level Maintenance	Old Zn Dust 3rd floor	C22	3ZHJN	3ZHJP	20 lb BC DRY CHEM Cart-Op	
Casting	Maintenance Whse	Old Zn dust north wall	C19	3ZHJQ	3ZHJR	20 lb BC DRY CHEM Cart -Op	
Casting	Maintenance Front Door	Old Zn dust East wall	C18	3ZHJS	3ZHJT	20 lb BC DRY CHEM Cart-Op	
Casting	Dust Hopper	Zn dust North Blowbin	C14	3ZHH1	3ZHH2	30 lb Class D Cart-Op	
Casting	Dust Hopper	Zn dust South blowbin	C15	3ZHH3	3ZHH4	30 lb Class D Cart-Op	
Casting	Dust Hopper	Zn dust basement	C16	3ZHH5	3ZHH6	30 lb Class D Cart-Op	
Casting	Dust Hopper	Zn dust baghouse	C17	3ZHH9	3ZHHB	30 lb Class D Cart-Op	
Casting	Electric room	MCC South	C8	3ZHGL	3ZHGM	20 lb Carbon Dioxide	
Casting	New Sub Station	West	C37	3ZHMT	3ZHMV	20 lb ABC DRY CHEM	
Casting	East Bldg W Wall	Die Cast west wall	C25	3ZHHY	3ZHHZ	20 lb ABC DRY CHEM Cart-Op	
Cellroom	Unit 1 Substation	1st Floor, East of Store rm	M5	3ZHM3	3ZHM4	15 lb Carbon Dioxide	
Cellroom	Unit 1 Substation	1st Floor North wall -Center		3ZHM5	3ZHM6	15 lb Carbon Dioxide	
Cellroom	Unit 1 Substation	1st Floor North of Stairs		3ZHM7	3ZHM8	15 lb Carbon Dioxide	
Cellroom	Unit 1 Substation	2nd Floor Top of Stairs		3ZHM9	3ZHMB	15 lb Carbon Dioxide	
Cellroom	Unit 1 Substation	Electrician office - West side		3ZHMC	3ZHMD	15 lb Carbon Dioxide	
Cellroom	Sub Station #8	By South Door		3ZHMP	3ZHMQ	20 lb Carbon Dioxide	
Cellroom	Unit 1 Substation	2nd floof center, wheel unit		3ZHMF	3ZHMG	50 lb Carbon Dioxide	
Cellroom	Unit 1 Substation	2nd floor North, wheel unit		3ZHMH	3ZHMJ	50 lb Carbon Dioxide	
Cellroom	Unit 1 Substation	1st floor by drill press		3ZHM1	3ZHM2	20 lb ABC DRY CHEM cart-Op	
Cellroom	Unit 1 Substation	2nd floor by west door		3ZHMK	3ZHML	20 lb ABC DRY CHEM Cart-OP	
Cellroom	Unit 1 Substation	2nd floor, South center wall		3ZHMM	3ZHMN	20 lb ABC DRY CHEM Cart-Op	
Cellroom	Elect room	MCC Below Office	Y7	3ZHLL	3ZHLM	10 lb Carbon Dioxide	
Cellroom	Sub Station 2	East wall - North	M17	3ZHLV	3ZHLW	10 lb Carbon Dioxide	
Cellroom	Sub Station 2	East Wall - Center	M18	3ZHLX	3ZHLY	10 lb Carbon Dioxide	
Cellroom	Sub Station 2	East Wall - South	M19	3ZHLZ	3ZHMO	10 lb Carbon Dioxide	
Cellroom	Prod Area	North - By steps		3ZHLS	3ZHLT	15 lb Carbon Dioxide	
Cellroom	Sub 13	Outside East Door		3ZHJV	3ZHJW	20 lb Carbon Dioxide	
Cellroom	Control room	W. Foremans Office	T6	3ZHLP	3ZHLN	20 lb ABC DRY CHEM	
Cellroom	TCA Towers Ground N	Column	T14	3ZHLO	3ZHL1	20 lb ABC DRY CHEM Cart-Op	

Table 3
Fire Extinguisher Locations
Big River Zinc Corporation
Sauget, Illinois

DEPARTMENT	LOCATION	Location 2	BRZ #	B/C UNIT	B/C SITE	TYPE	
Cellroom	TCA Towers Ground N	By catwalk over hot sump	T14	3ZHL2	3ZHL3	20 lb ABC DRY CHEM Cart-Op	
Cellroom	TCA Towers SW	Fan Floor		3ZHL4	3ZHL5	20 lb ABC DRY CHEM Cart-Op	
Cellroom	TCA Towers NW	Fan Floor		3ZHL6	3ZHL7	20 lb ABC DRY CHEM Cart-Op	
Cellroom	South	S. Basement	T8	3ZHLD	3ZHLF	20 lb ABC DRY CHEM Cart-Op	
Cellroom	Center	Center Basement West	T9	3ZHLG	3ZHLH	20 lb ABC DRY CHEM Cart-Op	
Cellroom	Center	Basement West		3ZHLJ	3ZHLK	20 lb ABC DRY CHEM Cart-Op	
Cellroom	Control room	S. Cellroom	T3	3ZHLQ	3ZHLR	20 lb ABC DRY CHEM Cart-Op	
Cellroom	Head Tankman Shack	Outside East Door	T12	3ZHQZ	3ZHRO	20 lb ABC DRY CHEM Cart-Op	
Cellroom	TCA Shack	By Water fountain		3ZHL8	3ZHL9	5 lb ABC DRY CHEM Cart-Op	
Cellroom	Unit # 3	Stripping floor - North		3FZSL	3FZSM	20 lb ABC DRY CHEM	
Cellroom	Unit # 3	Stripping floor - Mid		3FZSK	3FZSJ	20 lb ABC DRY CHEM	
Cellroom	Unit # 3	Stripping floor- South		3FZSH	3FZSG	20 lb ABC DRY CHEM	
Cellroom	Unit # 3	Basement - South		3FZSQ	3FZSR	20 lb ABC DRY CHEM	
Cellroom	Unit # 3	Basement - North		3FZSS	3FZST	20 lb ABC DRY CHEM	
Cellroom	Sub # 11	West wall		3FZS4	3FZS5	20 lb Carbon Dioxide	
Cellroom	Sub # 11	East wall		3FZSB	3FZSC	20 lb Carbon Dioxide	
Cellroom	Sub # 11	North wall -West		3FZS6	3FZS7	20 lb Carbon Dioxide	
Cellroom	Sub # 11	North wall - East		3FZS8	3FZS9	20 lb Carbon Dioxide	
Cellroom	Clean-up cells	Southwest corner		3FZSN	3FZSP	20 lb ABC DRY CHEM	
Cellroom	Gypsum removal towers	Top- Northeast corner		3ZHQX	3ZHQY	20 lb ABC DRY CHEM	
Cellroom	North Basement	NE of high press. pump	L17	3ZHPK	3ZHPL	20 lb ABC DRY CHEM cart-Op	
Engineering	Copy room	On floor by door		3ZHNN	3ZHNP	20 lb ABC DRY CHEM	
Leach Purification	Weak Acid Leach	By # 1 tank, North by door		3ZHP5	3ZHP6	20 lb ABC DRY CHEM	
Leach/Purification	MCC by paper press area	Inside MCC (Blueroom)		3ZHQS	3ZHQT	10 lb Carbon Dioxide	
Leach/Purification	# 9 Substation	North End		3ZHP7	3ZHP8	15 lb Carbon Dioxide	
Leach/Purification	# 9 Substation	South End	L31	3ZHP9	3ZHPB	15 lb Carbon Dioxide	Delete
Leach/Purification	O/S Maint			3ZHPH	3ZHPJ	15 lb Carbon Dioxide	Building
Leach/Purification	1st Stage	Midway by air drier		3ZHQ0	3ZHQ1	15 lb Carbon Dioxide	Demolished
Leach/Purification	Leach	South of #3 Leach Tank		3ZHPT	3ZHPV	20 lb Carbon Dioxide	2007
Leach/Purification	2nd Stage	West pole by #1 Tank		3ZHQ4	3ZHQ5	20 lb Carbon Dioxide	
Leach/Purification	2nd Stage	East of Presses		3ZHQ8	3ZHQ9	20 lb Carbon Dioxide	
Leach/Purification	Eimco Floor	West of #3 Eimco	L1	3ZHQ6	3ZHQ7	20 lb ABC DRY CHEM	
Leach/Purification	Residue	North of Floc Make-up tank		3ZHQL	3ZHQM	20 lb ABC DRY CHEM	
Leach/Purification	1st Stage new presses	Southeast corner		3ZHQN	3ZHQP	20 lb ABC DRY CHEM	
Leach/Purification	ZSM	MCC Blower room		3ZHPC	3ZHPD	20 lb ABC DRY CHEM Cart-Op	

Table 3
Fire Extinguisher Locations
Big River Zinc Corporation
Sauget, Illinois

DEPARTMENT	LOCATION	Location 2	BRZ #	B/C UNIT	B/C SITE	TYPE	
Leach/Purification	ZSM	South pole by locker	L32	3ZHPM	3ZHPN	20 lb ABC DRY CHEM cart-op	
Leach/Purification	ZSM	Cd precip tanks by steps		3ZHPP	3ZHPQ	20 lb ABC DRY CHEM Cart-Op	Delete
Leach/Purification	Leach	South of # 1 Leach Tank		3ZHPR	3ZHPS	20 lb ABC DRY CHEM cart-op	Building
Leach/Purification	Leach	N. Calcine bin top	L07	3ZHPW	3ZHPX	20 lb ABC DRY CHEM cart-op	Demolished
Leach/Purification	1st Stage	1st Stage North	L8	3ZHPY	3ZHPZ	20 lb ABC DRY CHEM cart-op	2007
Leach/Purification	1st Stage	1st Stage South	L09	3ZHQ2	3ZHQ3	20 lb ABC DRY CHEM cart-op	
Leach/Purification	Residue MCC	Outside	L23	3ZHQB	3ZHQC	20 lb ABC DRY CHEM Cart-Op	
Leach/Purification	Residue	Control room	L24	3ZHQD	3ZHQF	20 lb ABC DRY CHEM Cart-Op	
Leach/Purification	Residue Room	South Residue press		3ZHQG	3ZHQH	20 lb ABC DRY CHEM cart-op	
Leach/Purification	Residue Room	North press control panel		3ZHQJ	3ZHQK	20 lb ABC DRY CHEM Cart-Op	
Leach/Purification	Foremans Office	South wall	L14	3ZHQQ	3ZHQR	20 lb ABC DRY CHEM cart-Op	
Leach/Purification	Press paper area	South	L15	3ZHQV	3ZHQW	20 lb ABC DRY CHEM Cart-OP	
Leach/Purification	Eimco Sump	East of deep leg pit	L18	3FZRV	3FZRT		
Leach/Purification	Southwest Leach-down	S.W. of Leach tanks	L2	3FZRY	3FZRZ		
Leach/Purification	Inside North door	North of # 3 Leach Tank	L3	3FZSO			
Leach/Purification	East of Classifier/Ball mill	On pole by ramp	L4	3FZRW			
Maintenance	Leach/Purification	Northwest of Maint. Shack		3ZHPF	3ZHPG	20 lb ABC DRY CHEM	
Maintenance	Casting-Near back door	Mounted to work bench		3ZHJB	3ZHJC	20 lb ABC DRY CHEM Cart-Op	
Maintenance	Cadmium	Maintenance shop		3ZHHR	3ZHHS	5 lb ABC DRY CHEM Cart-OP	
Maintenance	Cellroom Maintenance area	Northwest of welding booth		3ZHLB	3ZHLC	20 lb ABC DRY CHEM Cart-Op	
Maintenance	Gas pumps	west side		3ZHKP	3ZHKQ	20 lb ABC DRY CHEM Cart-Op	
Maintenance	Main Compressor Room	Near West door		3ZHK5	3ZHK6	20 lb Carbon Dioxide	
Maintenance	Main Compressor Room	Between #7 & 8 Air Control		3ZHK3	3ZHK4	20 lb ABC DRY CHEM Cart-Op	
Maintenance	Oil house	North side		3ZHK7	3ZHK8	20 lb ABC DRY CHEM	
Maintenance	Oil house	South side		3ZHK9	3ZHKB	20 lb ABC DRY CHEM Cart-Op	
Maintenance	Quanset Hut	Front door		3ZHJ4	3ZHJ5	20 lb ABC DRY CHEM Cart-Op	
Maintenance	Quanset hut	Center		3ZHJ6	3ZHJ7	20 lb ABC DRY CHEM Cart-Op	
Maintenance	Quanset hut	Back door		3ZHJ8	3ZHJ9	20 lb ABC DRY CHEM Cart-Op	
Maintenance	Vehicle Shop	By bulk oil drum		3ZHN4	3ZHN5	15 lb Carbon Dioxide	
Maintenance	Pump Shop	By parts wash	M27	3ZHND	3ZHNF	15 lb Carbon Dioxide	
Maintenance	CRNE AP308	CP5		3ZHMW	3ZHMX	2.5 ABC DRY CHEM	
Maintenance	SW Pole	East of hand wash area	M24	3ZHN6	3ZHN7	20 lb ABC DRY CHEM Cart-OP	
Maintenance	Vehicle Shop	South door	M25	3ZHN8	3ZHN9	20 lb ABC DRY CHEM Cart-Op	
Maintenance	Welding Shop	Near South door	M26	3ZHNB	3ZHNC	20 lb ABC DRY CHEM Cart-Op	
Maintenance	Instrument Shop	South wall		3ZHNJ	3ZHNK	20 lb ABC DRY CHEM Cart-Op	
Maintenance	Crane CP1	Drott Go-Devil		3ZHNO	3ZHN1	5 lb ABC DRY CHEM	

Table 3
Fire Extinguisher Locations
Big River Zinc Corporation
Sauget, Illinois

DEPARTMENT	LOCATION	Location 2	BRZ #	B/C UNIT	B/C SITE	TYPE	
Maintenance	Crane 2			3ZHMY	3ZHMZ	5 lb ABC DRY CHEM Cart-Op	
Maintenance	Cart CS7			3ZHN2	3ZHN3	5 lb ABC DRY CHEM Cart-Op	
Maintenance	Office	Northwest Corner		3ZHNL	3ZHNM	5 lb ABC DRY CHEM Cart-OP	
Maintenance	Near north wall on workbench	West of horrizontal mill		3ZHNG	3ZHNH	30 lb Class D Cart-Op	
Maintenance	Roast/Acid maint shack	Inside on column		3ZHCF	3ZHCG	15 lb Carbon Dioxide	
Pre-Leach	By Maint.			3ZHBS	3ZHBT	15 lb Carbon Dioxide	
Pre-Leach	N By Steps	WT Vaccum pump at steps	R31	3ZHBX	3ZHBY	15 lb Carbon Dioxide	
Pre-Leach	O/S Oil HS	Oil House	R17	3ZHCH	3ZHCJ	20 lb ABC DRY CHEM	
Pre-Leach	Conveyor			3ZHBV	3ZHBW	20 lb ABC DRY CHEM Cart -OP	
Pre-Leach	Pump room Basement			3ZHBZ	3ZHCO	20 lb ABC DRY CHEM Cart-Op	
Pre-Leach	By Hopper			3ZHC3	3ZHC4	20 lb ABC DRY CHEM Cart-Op	
Pre-Leach	Line Cnter			3ZHC5	3ZHC6	20 lb ABC DRY CHEM Cart-Op	
Pre-Leach	Line East			3ZHC7	3ZHC8	20 lb ABC DRY CHEM Cart--Op	
Pre-Leach	Pump House			3ZHCC	3ZHCD	20 lb ABC DRY CHEM Cart-Op	
Pre-Leach	By sub # 7	East of Pre heater on Post	R33	3ZHCK	3ZHCL	20 lb ABC DRY CHEM Cart-Op	
Pre-Leach	Control room	Control room	R21	3ZHC1	3ZHC2	20 lb Carbon Dioxide	
Purchasing	Store room	Southwest Corner	S3	3ZHNS	3ZHNT	20 lb ABC DRY CHEM Cart-Op	
Purchasing	Store room	West pole	S2	3ZHNV	3ZHNW	20 lb ABC DRY CHEM cart-Op	
Purchasing	Store room	East pole		3ZHNX	3ZHNY	20 lb ABC DRY CHEM Cart-Op	
Purchasing	Hallway	Between restrooms		3ZHNQ	3ZHNR	5 lb ABC DRY CHEM Cart-Op	
Roast/ Acid	Ore shed - Center	Conc. Storage center	R2	3ZHCT	3ZHCV	15 lb Carbon Dioxide	
Roast/Acid	Acid plant	Coolong Tower	R20	3ZHCP	3ZHCQ	20 lb ABC DRY CHEM Cart-Op	
Roast/Acid	Acid Control Room	Acid Control	R19	3ZHCM	3ZHCN	15 lb Carbon Dioxide	
Roast/Acid	SE Substation	Motor Control Room-east	R15	3ZHD4	3ZHD5	15 lb Carbon Dioxide	
Roast/Acid	Elect Room SW	Motor Control Room-South	R18	3ZHD8	3ZHD9	15 lb Carbon Dioxide	
Roast/Acid	Sub Station # 7	Motor Control Room-West	R16	3ZHDB	3ZHDC	15 lb Carbon Dioxide	
Roast/Acid	Sub Station # 7	Substation 7	R34	3ZHDD	3ZHDF	15 lb Carbon Dioxide	
Roast/Acid	Roaster Southeast			3ZHDL	3ZHDM	15 lb Carbon Dioxide	
Roast/Acid	Roaster East Stair			3ZHDQ	3ZHDR	15 lb Carbon Dioxide	
Roast/Acid	Roof Center	Hoist house 5th	R5	3ZHF5	3ZHF6	15 lb Carbon Dioxide	
Roast/Acid	Ore Shed North	Conc. Storage north	R3	3ZHCR	3ZHCS	20 lb ABC DRY CHEM Cart-OP	
Roast/Acid	Ore Shed South	Conc. Storage South	R1	3ZHCW	3ZHCX	20 lb ABC DRY CHEM Cart-OP	
Roast/Acid	Ore Shed Train Dock NW	Conc. unloading SW	R25	3ZHCY	3ZHCZ	20 lb ABC DRY CHEM Cart-OP	
Roast/Acid	Ore Shed Train Dock SW	Conc. Unloading E	R26	3ZHDO	3ZHD1	20 lb ABC DRY CHEM Cart-Op	
Roast/Acid	Ore Shed Train Dock SE	Conc. Unloading- East	R27	3ZHD2	3ZHD3	20 lb ABC DRY CHEM Cart-OP	
Roast/Acid	Roaster North	Roaster 1st Flr Windbox	R14	3ZHD6	3ZHD7	20 lb ABC DRY CHEM Cart-Op	

Table 3
Fire Extinguisher Locations
Big River Zinc Corporation
Sauget, Illinois

DEPARTMENT	LOCATION	Location 2	BRZ #	B/C UNIT	B/C SITE	TYPE	
Roast/Acid	Roaster West Stairs	Air Compressor Building	R35	3ZHDG	3ZHDH	20 lb ABC DRY CHEM Cart-Op	
Roast/Acid	Roaster SW	Roaster 2nd Flr mid-West	R13	3ZHDJ	3ZHDK	20 lb ABC DRY CHEM Cart-Op	
Roast/Acid	Roaster Center			3ZHDN	3ZHDP	20 lb ABC DRY CHEM Cart-Op	
Roast/Acid	Roaster SE	Roaster 3rd floor-east	R9	3ZHDS	3ZHDT	20 lb ABC DRY CHEM Cart-OP	
Roast/Acid	Roaster SW	Roaster 3rd floor-west	R8	3ZHDV	3ZHDW	20 lb ABC DRY CHEM Cart-OP	
Roast/Acid	By Hoppers			3ZHDX	3ZHDY	20 lb ABC DRY CHEM Cart-Op	
Roast/Acid	By Hoppers	Roaster 4th floor	R6	3ZHDZ	3ZHFO	20 lb ABC DRY CHEM Cart-Op	
Roast/Acid	By Hoppers	Roaster 4th floor	R7	3ZHF1	3ZHF2	20 lb ABC DRY CHEM Cart-Op	
Roast/Acid	Bin control	Shaker Screne room	R29	3ZHF3	3ZHF4	20 lb ABC DRY CHEM Cart-Op	
Roast/Acid	Foremans Office	Foremans office	R36	3ZHC9	3ZHCB	5 lb ABC DRY CHEM	
Roast/Acid	Spill Kit(Hazardous Waste)	Sludge Pad Sump		3ZHRS	3ZHRT	15 lb Carbon Dioxide	
Roast/Acid	Spill Kit(Hazardous Waste)	Sludge Pad Sump		W-878545		20lb Carbon Dioxide	
Safety	Wash room			3ZHKW	3ZHKX	20 lb ABC DRY CHEM	
Safety	Store room			3ZHKY	3ZHKZ	20 lb ABC DRY CHEM	
Security	Lunchroom	South wall by light switch	S09	3ZHKT	3ZHKV	20 lb ABC DRY CHEM	
Security	Mens Locker room	Dirty side E wall by coat rack	S10	3ZHP3	3ZHP4	15 lb Carbon Dioxide	
Security	Mens locker room	W wall next to boiler room	S12	3ZHNZ	3ZHPO	20 lb ABC DRY CHEM Cart-Op	
Security	Mens locker room	S Wall next to thermostat	S11	3ZHP1	3ZHP2	20lb ABC DRY CHEM Cart-Op	
Security	Guard shack lobby	North wall clock alley	S16	3ZHKR	3ZHKS	20 lb ABC DRY CHEM Cart-Op	
Security	Womens locker room	S wall in hall/salary side	S15	3ZHJZ	3ZHKO	20 lb ABC DRY CHEM	
Security	Womens Locker room	N wall in hall/hourly side	S14	3ZHK1	3ZHK2	5 lb ABC DRY CHEM	
Spare	Safety Storage			3ZHRJ	3ZHRK	10 lb ABC Dry Chem	
Spare	Safety storage			3ZHR1	3ZHR5	20 lb ABC DRY CHEM	
Spare	Safety Storage			3ZHR2	3ZHR5	20 lb ABC DRY CHEM	
Spare	Safety Storage			3ZHR3	3ZHR5	20 lb ABC DRY CHEM	
Spare	Safety Storage			3ZHR4	3ZHR5	20 lb ABC DRY CHEM	
Spare	Safety Storage			3ZHR6	3ZHRC	20 lb ABC DRY CHEM Cart_op	
Spare	Safety Storage			3ZHRT	3ZHRC	20 lb ABC DRY CHEM Cart-Op	
Spare	Safety Storage			3ZHR9	3ZHRC	20 lb ABC DRY CHEM Cart-Op	
Spare	Safety Storage			3ZHRB	3ZHRC	20 lb BC DRY CHEM Cart-Op	
Spare	Safety Storage			3ZHRD	3ZHRF	30 lb Class D Cart-Op	
Spare	Safety Storage			3ZHRG	3ZHRH	17 lb Halon 1211	
Spare	Safety Storage			3ZHRQ	3ZHRR	2.5 Gallon Pressurized Water	
Spare	Safety Storage			3ZHR8	3ZHRC	20 lb ABC DRY CHEM Cart-Op	
Spare	Safety Storage			3ZHRL	3ZHRM	5 lb ABC DRY CHEM	

Table 3
Fire Extinguisher Locations
Big River Zinc Corporation
Sauget, Illinois

DEPARTMENT	LOCATION	Location 2	BRZ #	B/C UNIT	B/C SITE	TYPE	
Test Plant	Pilot Bay	By telephone		3ZHKK	3ZHKL	20 lb Carbon Dioxide	
Test Plant	Annex	By East door		3ZHKC	3ZHKD	20 lb ABC DRY CHEM	
Test Plant	Zinc Powder			3ZHKF	3ZHKG	20 lb ABC DRY CHEM	
Test Plant	Office	By Restroom		3ZHKM	3ZHKN	5 lb ABC DRY CHEM cart-OP	
Test Plant	Zinc Powder	Platform		3ZHKH	3ZHKJ	30 lb Class D Cart-Op	

RCRA CONTINGENCY PLAN
AND EMERGENCY RESPONSE PROCEDURES

BIG RIVER ZINC CORPORATION
SAUGET, ILLINOIS

Revised March 14, 2008

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APPENDICES

Figures

1.0 INTRODUCTION

This RCRA Contingency Plan and associated Emergency Response Procedures (ERP) have been prepared for the Big River Zinc Corporation (BRZ) facility in Sauget, Illinois, in compliance with the requirements outlined in the U.S. Environmental Protection Agency (USEPA) rules and regulations for the Resource Conservation and Recovery Act (RCRA) - Hazardous Waste 40 CFR Part 264. Specifically, this document contains the requirements set forth by RCRA regarding a facility's Contingency Plan and Emergency Procedures for the accidental release of hazardous waste (40 CFR Part 264, Subpart D).

This Plan will be updated if the plan fails in an emergency, the facility changes in a way that increases the potential for fires, explosions, or releases of hazardous waste, or there is a change in the emergency coordinators or emergency equipment lists.

2.0 DESCRIPTION OF FACILITY

Big River Zinc Corporation (BRZ), Sauget, Illinois is engaged in the production of zinc. Sulfuric acid, copper cake, lead/silver concentrate, copper precipitate, and cadmium oxide are sold as by-products. The manufacturing process begins with fluid bed roasting of zinc sulfide concentrates. Sulfur dioxide is produced during the roasting process and is used to create sulfuric acid. The impure zinc oxide from the roaster is treated in several stages with sulfuric acid to leach out metals such as zinc, copper, cobalt, and cadmium. These metals are recovered and are sold as by-products to other industries, as is the lead and silver contained in the insoluble lead concentrate recovered from the leaching steps. The zinc goes through several additional steps and is recovered from solution by an electrowinning process. The sheets are washed and fed into an electric- induction-melting furnace. The zinc is then poured into a mold, cooled, and shipped to the customers.

The facility is located at Route 3 and Monsanto Ave., Sauget, Illinois (Figure 1). The facility has three production shifts. Facility personnel are on site 24 hours per day, 7 days per week. The facility property is oriented on a north-south axis and comprises 35.4 acres with approximately 60% of the property under roof or paved.

BRZ has one hazardous waste roll-off container, which is located west of the cadmium building. Filters containing metals are disposed of in the roll-off container. The roll-off is emptied at least every 90 days.

3.0. EMERGENCY REPORTING PROCEDURES

At all times, there is at least one employee at the facility or individuals who can be contacted with the responsibility for coordinating all internal emergency response measures at the facility. As required by federal regulations, the Emergency Coordinator (EC), or his alternate, is thoroughly familiar with all aspects of the ERP, all operations and activities at the facility, and the location of appropriate facility records. The EC and alternates may be reached through the security department.

3.1 Implementation of the Emergency Response Plan

The primary or the alternate Emergency Coordinators will decide which portions of this ERP are to be implemented following an evaluation of the site conditions. The basis of the EC's decision is his assessment of the magnitude of the emergency. The EC will determine if the emergency presents an actual or possible threat to human health and the environment, or if Big River Zinc personnel can control the situation.

Some types of emergencies that require full implementation of the ERP include:

- A fire that could spread off site;
- A fire that is too large to extinguish with a portable fire extinguisher;
- A spill or release of hazardous material that results in airborne constituents; and
- Uncontainable runoff due to a large fire, spill or release of material.

3.2 Internal Notification Procedures

Personnel

Upon discovering a situation that may represent an emergency, plant personnel will:

a. Report the situation to a supervisor immediately or call security if the supervisor cannot be found immediately; and

b. Verbally warn other personnel if the situation is an immediate threat to their safety.

Supervisor/Security

When notified of an emergency situation, the supervisor/security will:

a. Take necessary steps to prevent injury to personnel, damage to equipment, and any potential fire hazard; and

b. Contact the Emergency Coordinator or Alternate.

Note: It is BRZ policy that employees are not permitted to respond to uncontrolled releases of hazardous material or, likely uncontrolled releases, or place themselves in danger during a major uncontrolled emergency situation such as a large fire, an explosion or series of explosions, or life threatening major spill or fume release.

the only releases that BRZ employees are allowed to respond to are those that are incidental where the substance can be absorbed, neutralized, or otherwise controlled at the time of release by employees in the immediate release area, or by maintenance personnel.

In the event of an uncontrolled release or release that is likely to become uncontrolled, use the evacuation procedure.

At BRZ, uncontrolled releases are not likely to result from hazardous waste. So use the following procedures unless personal safety is threatened as described in the preceding 3 paragraphs.

Emergency Coordinator

The primary EC (or an alternate) will follow the procedures below in the event of a release, explosion, fire, or other emergency:

- Assess the situation and if warranted:

  Declare an emergency and notify all plant personnel with instructions by two-way radios. If there is a release, fire, or explosion that could threaten human health or environment outside the facility, the EC is to immediately declare an emergency.

  Notify security to call for police and/or fire department. The police or fire departments have the responsibility for coordinating outside response efforts. Telephone numbers of emergency response agencies are located in Section 3.3. A two-way radio connection is also available in the security office for contacting the police and fire departments.

- Commit and direct activities of any and all resources available that are necessary to carry out the ERP. The EC will focus on measures to eliminate potential harm to human health and the environment.

Whenever there is a release, fire, or explosion, the EC will act without delay to identify the character, exact source, amount, and aerial extent of the released materials. This may be accomplished by observation or review of facility records, manifests, and, if necessary, by chemical analysis. The EC will inspect for possible hazards to human health or the environment, both direct and indirect. This assessment will consider onsite and offsite effects as required.

Throughout the emergency, the EC will take measures, which are reasonable and necessary to ensure that fires and/or releases do not have an effect on any other substances at the facility.

3.3 Emergency Contact Phone List

Security	Ext. 110 (Internal Plant Phone) (618) 274-5000 ext. 110 (Outside Phone) Plant Radio
Primary Emergency Coordinator	
Mike Altepeter	(618) 274-5000 Ext.194 (office) (314) 846-8093 (Home) (618) 410-8021 (cell)
Home Address	2936 Point Drive St. Louis, MO 63129
Alternate Emergency Coordinator	
Anthony Thomas	(618) 274-5000 Ext. 198 (office) (618) 410-8020 (cell) (314) 383-8020 (Home)
Home Address	7009 Lexington St. Louis, Mo 63121
Second Alternate Emergency Coordinator	
Steve Ash	(618 0 274 5000 ext 243 (office) (618) 410 4703 (cell)
Home Address	548 Parkside Commons Collinsville, IL 62234

Federal	National Response Center (Release of Hazardous Substances)	(800) 424-8802
	USEPA Region V	(312) 353-2000
State	Illinois Emergency Management Agency	(800) 782-7860
Local Emergency Response: Sauget Police, Fire, Ambulance		911
Local Emergency Planning Committee (LEPC)		(618) 277-3012

Mr. Don Feher
Local Emergency Planning Committee
321 W. "F" Street
Belleville IL 62220-1193

Hospital

Memorial Hospital Emergency (618) 257-5840
Attn. Mr. Don Schneider
4500 Memorial Drive
Belleville, IL 62226

Contractor Support

Heritage Environmental (800) 388-3500
Attn: Mr. Dan Hans
1188 Pershall Road
Bellfountaine, MO 63137

Onyx Industrial Services (618) 931 0010
Fred Davidson
121 East Chain of Rocks Road
Mitchell, IL 62040

Bellon Environmental Company (314) 890 8600
Bob Goodman
600 Fairview
St. Louis, MO 63132

Big River Zinc has discussed the contents of this plan, and has provided a copy of the plant location to the Sauget Fire and Police Departments, the LEPC, Heritage Environmental and Memorial Hospital.

3.4 Evacuation Plan

The EC will assist the fire department in determining the need for evacuation of the area surrounding the plant. This assessment is based on the EC's knowledge of the hazardous materials involved, the site conditions, and the current weather conditions. The role of the EC in this situation is an advisory one, and the decision to evacuate an area is the responsibility of the appropriate agencies.

The EC and alternates are responsible for the plant-wide evacuations only. Designated evacuation routes for plant personnel are displayed on Figure 2. Communication of evacuation to employees is by two-way radios, alarms, intercom, and other personnel to insure that all employees are informed and evacuated. The fire alarms are tested monthly to ensure they are in proper working condition. If an evacuation is ordered, plant personnel shall discontinue operation of all equipment and evacuate the area as soon as possible. Evacuation routes are determined according to the plant area affected.

Upon receiving instruction by two-way radio or by activation of an audible warning device, supervisors are to instruct employees to leave the facility according to their predetermined exit routes. The employees are to go to the designated assembly point, west of the facility, in the employee parking lot. Once the plant is evacuated, the supervisor of each area takes a prompt and accurate account of all personnel to ensure that everyone is accounted for.

The fire department is responsible for evacuation plans within the surrounding area and for coordinating local resources, including the police department and hospitals to assist in the implementation of the evacuation plan.

The EC, in consultation with the fire department and other local agencies, as necessary, will decide when reoccupation of the facility is possible. Only after following all the post-emergency procedures (see Section 5.0) can the facility resume operation.

3.5 Emergency Response Procedures

3.5.1 Fire and Explosion Emergency Response

Please see BRZ policy statement concerning major emergency situations on Page 4 of this document.

An employee, upon detecting a fire or imminent explosion in the facility, will initiate the following actions:

- Use hand-held fire extinguishers to control or extinguish the fire if the fire is in an initial, controllable stage and no potential for imminent explosion exists.
- Contact his supervisor or security. Security will locate the EC and inform him of the fire and its location. Activate the alarm system. The supervisor will begin response preparation.

- Upon receiving available information, the EC or security will call the fire department to inform them of the situation and receive instruction.

After following the steps outlined above for emergency situations, the EC or, in his absence, the supervisor, must do the following:

- Take action to shut off electrical power and any gas in the vicinity of the fire location. Stop process and/or operations that may interfere with the emergency response actions;
- Take action, if necessary and safe to do so, to place absorbent materials around drains to prevent spilled hazardous waste from entering the sewer system;
- Notify all unauthorized personnel to vacate the area per evacuation plans; and
- Follow any instruction given by the fire department.

In addition, the EC must also:

- Note the current weather conditions and estimate the current wind direction and speed;
- Identify the character, source, amount, and aerial extent of any released hazardous materials by observation and review of facility records, manifests, and, if necessary, by chemical analysis; and
- Determine if the situation necessitates complete evacuation of the plant site. Furthermore, the EC will assist the Fire Department in their decision to evacuate the surrounding area.

If the situation meets the criteria for full implementation, at the first opportunity, the EC shall report the emergency to the National Response Center **(800-424-8802)** and the Illinois Emergency Management Agency **(800-782-7860)**. This verbal report includes:

- Name, address, and telephone number of the reporter;
- Name and address of the facility;
- Time and type of incident;
- Name and reportable quantity of material involved to the extent known;
- Extent of injuries, if any; and
- Possible hazards offsite to human health and the environment.

3.5.2 Spill Emergency Response

Any employee discovering a hazardous waste spill is to immediately notify his supervisor or security. Security will notify the EC or alternate. The EC will assess the situation and act as follows:

- Clear the area of unauthorized personnel. Stop process and/or operations that may interfere with the emergency response;
- Identify the source or cause of the release material and obtain a Material Safety Data Sheet(s) (MSDS). Use MSDS information to guide response and determine personal protective equipment (PPE) required;
- Direct trained personnel to don the appropriate PPE, as used in normal job duties, and re-containerize the spilled material;
- Alert local authorities if material may reach outside facility property;
- Rope off and/or barricade the area to prevent entry of unauthorized personnel;
- Take measures to contain the spill;
- Direct cleanup so that all hazardous materials are placed in properly labeled containers;
- Ensure that spill material, water, and adsorbents are placed in Department of Transportation (DOT) approved containers for ultimate disposal; and
- Insure that no incompatible wastes are stored within the spill area until cleanup is complete.

4.0 RELEASE REPORTING REQUIREMENTS

4.1 General

In the event of external release of a hazardous material, the procedures outlined in Section 3.0 will be followed. Prior to contacting state and local agencies, the EC will gather as much information about the incident as quickly as possible. The concerned agencies will then be contacted with initial information. The appropriate agencies will be kept informed of any new, additional, or changed information regarding the incident.

4.2 Release of RCRA Hazardous Waste

In case of a fire, explosion, or release of hazardous waste (equal to or greater than the reportable quantity for the material), as defined under RCRA (40 CFR, Section 261) which could threaten human health or the environment outside the facility, concerned agencies will be contacted as soon as possible by the EC. If the evacuation of surrounding areas may be required, local emergency response teams will be alerted. The following agencies will be contacted by the EC:

Federal	National Response Center	(800) 424-8802
	USEPA Region V	(312) 353-2000
State	Illinois Emergency Management Agency	(800) 782-7860
Local	Sauget Fire, Police, Ambulance	911
	Mr. Don Feher Local Emergency Planning Committee (LEPC) 321 W. "F" Street Belleville, IL 62220-1193	(618) 277-3012

Contractor Support:

	Heritage Environmental Attn. Mr. Dan Hans 1188 Pershall Road Bellfountaine, MO 63137	(800) 377-2440
Or		
	Veolia Industrial Services Gary Timm 121 East Chain-of-Rocks Road Mitchell, IL 62040	(618) 931 0010

5.0 POST-EMERGENCY PROCEDURES

When the emergency is contained, and a threat to human health and the environment no longer exists, the EC will take the following post-emergency actions:

- Decontamination/cleanup;
- Waste management;
- Post-emergency reporting; and
- Post-emergency assessment.

5.1 Decontamination/Cleanup

All of the equipment used in the emergency response procedures will be either decontaminated or properly containerized for disposal. Any non-emergency response equipment, such as materials or machinery, also affected by the emergency response will be decontaminated or disposed. The EC is responsible for arranging immediate replacement of any spent emergency response materials.

5.2 Waste Management

Waste residual materials, along with emergency response equipment needing disposal, will be collected and containerized in accordance with applicable regulations governing the management of such materials. Once all hazardous material is properly containerized, storage and disposal will be conducted according to applicable regulations.

5.3 Post-Emergency Reporting

The EC is responsible for ensuring the preparation and submittal of all required reports. A release, fire or explosion requires a written report to the USEPA Region V within 15 days of the event and the IEPA upon request only. The report will include:

- Name, address, and telephone number of the facility;
- USEPA identification number for the site;
- Date, time, and type of incident (e.g., fire, spill, etc.);
- Name and quantity of material(s) involved;
- Extent of injuries, if any;

- Assessment of any actual or potential hazards to human health or the environment;
- Procedures followed to reduce and remove released materials;
- Estimated quantity and disposition of the recovered material that resulted from the incident;
- Corrective measures taken;
- Whether an evacuation was required; and
- Name of individuals who have also been contacted or notified.

5.4 Post-Emergency Assessment

After the emergency episode, the EC will determine the causes of the emergency and analyze the effectiveness of emergency response procedures. The ERP will be modified if it is determined that procedures are inadequate or ineffective. If equipment capabilities are found unacceptable, necessary improvements will be made.

6.0 EMERGENCY EQUIPMENT

6.1 Communication Systems

Four different communication systems are available in the case of an emergency. They are described below.

Type	Description	Inspection Required
Two-Way Radios	The base station for the two-way radios is located in the main Security Office at the main gatehouse. Six two-way radios are located in the security department. Each of the four departments has a minimum of two radios that are normally carried by the supervisors. Many of the operators also have two-way radios. Fourteen radios are assigned to maintenance supervisors and the "rotating shift" electrician and mechanic. Two-way radio communications with the police and fire departments of Sauget is available to security. A weather monitor is available 24-hours per day in case of a weather emergency.	Radios are in use daily so any problems with the system or individual radios would be detected immediately.
Telephones	There are three lines into the Security Office. Telephones are located in all supervisors offices, all control rooms, all administrative offices, and in various maintenance areas. Inner plant phones do not have access to outside lines so security must be called in case of emergency.	Telephones are in use daily so any problems would be detected immediately.
Cell Phones	There are 19 Cell Phones issued to Key company management personnel. These can be used to contact people needed while outside or inside the plant. The cell phones can be used as normal phone or "walkie talkie" mode.	The cell phones are in use daily so any problems would be detected immediately.
Message Center Operations	A continuing liaison can be maintained through the Security Office for needed information by using the telephone communications. However, emergency communications would generally be handled through the two-way radios and Cell Phones for faster response time.	N/A

6.2 Fire Equipment

Fire response equipment is located throughout the facility. This includes sprinkler systems, hand held fire extinguishers, and fire equipment boxes.

A smoke detection system is located in the computer room on the bottom floor of the administrative building and in the Safety Office. These systems sound in the main security office when activated. Five automatic deluge sprinkler systems are located throughout the plant. These systems and the twelve fire hydrants are supplied with water under pressure through the fire protection pump. An alarm siren and warning light are located on the outside of the building to alert personnel that the system is in use. The sprinkler systems are checked once a month by the maintenance department.

A list of the location and contents of the hand held fire extinguishers is located in Table 1 of Appendix B. The department supervisors inspect the extinguishers on a weekly basis. Documented inspections of the fire extinguishers are located in the safety department. In other areas, a designated person inspects the extinguishers on a monthly basis. Fire extinguisher training is held annually for all employees. No employees are trained when hired.

There are seven fire equipment boxes located throughout the facility. A list of these locations and contents of the boxes are provided in Table 2 of Appendix B. The boxes are inspected on a monthly basis by the security department.

6.3 Personnel Protective Equipment

Please see BRZ policy statement concerning major emergency situations on Page 4 of this document.

In case of a release, fire, or explosion, goggles, face shields, respiratory protection, full body acid suits, and barrier cream are available from the Safety Department. Rubber dielectric boots, heavy-duty rubber gloves, neoprene gloves, vinyl and latex gloves, and Tyvek disposable clothing are available from the storeroom.

6.4 First Aid

Stretchers are available in the foreman's office of every department. Safety showers are located at various locations in each department. Stokes basket and confined space rescue equipment are stored in the respirator room.

6.5 Spill Response Kits

Spill response kits containing appropriate tools and sorbent materials are located throughout the facility. A list of the spill kits and their locations are presented in Table 3 of Appendix B.

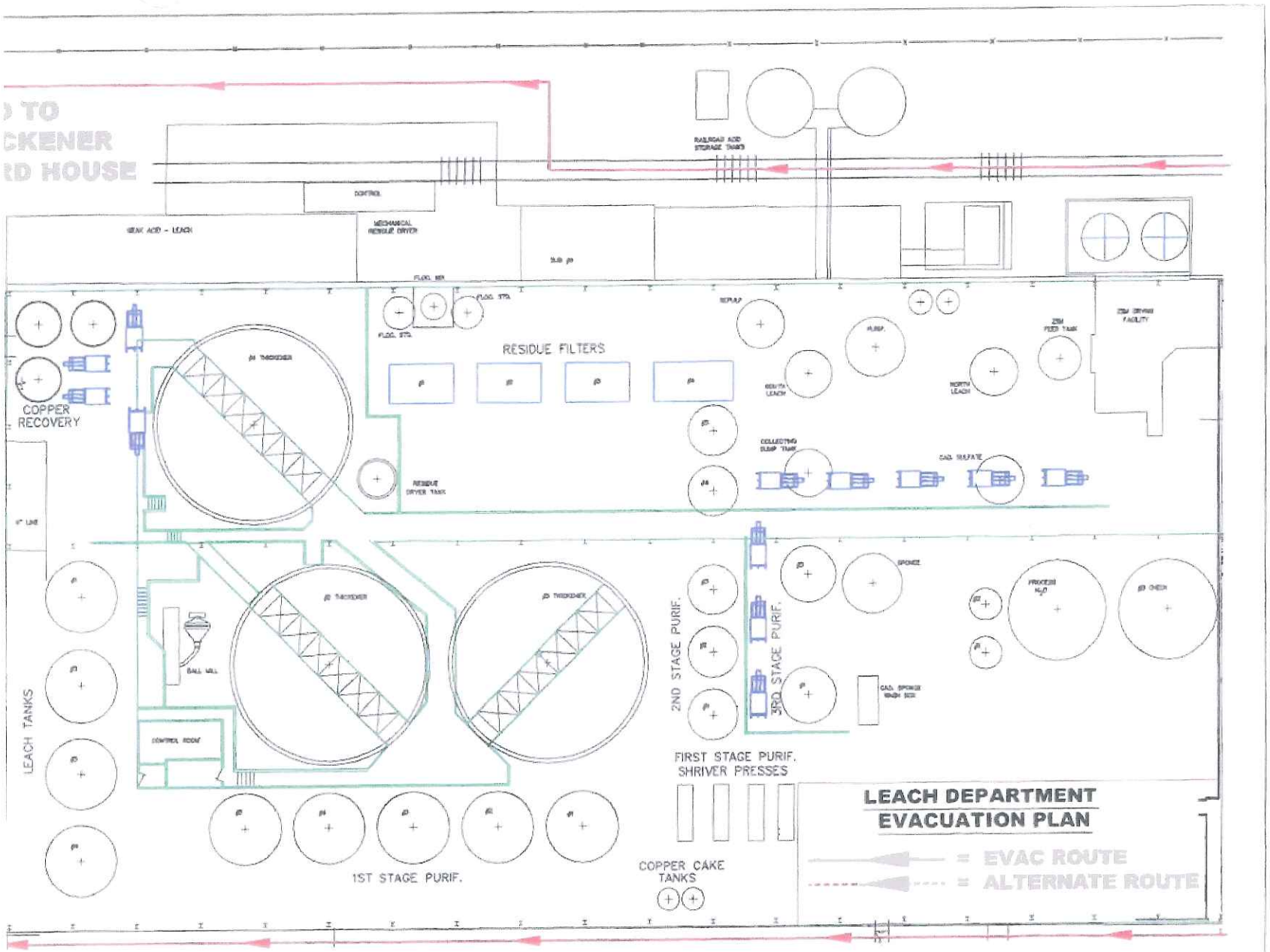
7.0 Training

Copies of all training documents will be kept in the Environmental manager's files and in Safety dept files , and on the Server. Please refer to the RCRA training document for a detailed description on training. As a minimum the program will document:

a. The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job.
b. A written job description for each position described above.
c. A written description of the type and amount (RCRA Training Document) of both introductory and continuing training that will be given to each person described above.
d. Training records detailing training given will be kept for at least three years from the date the employee last worked for the company.

APPENDIX A

FACILITY SITE DIAGRAMS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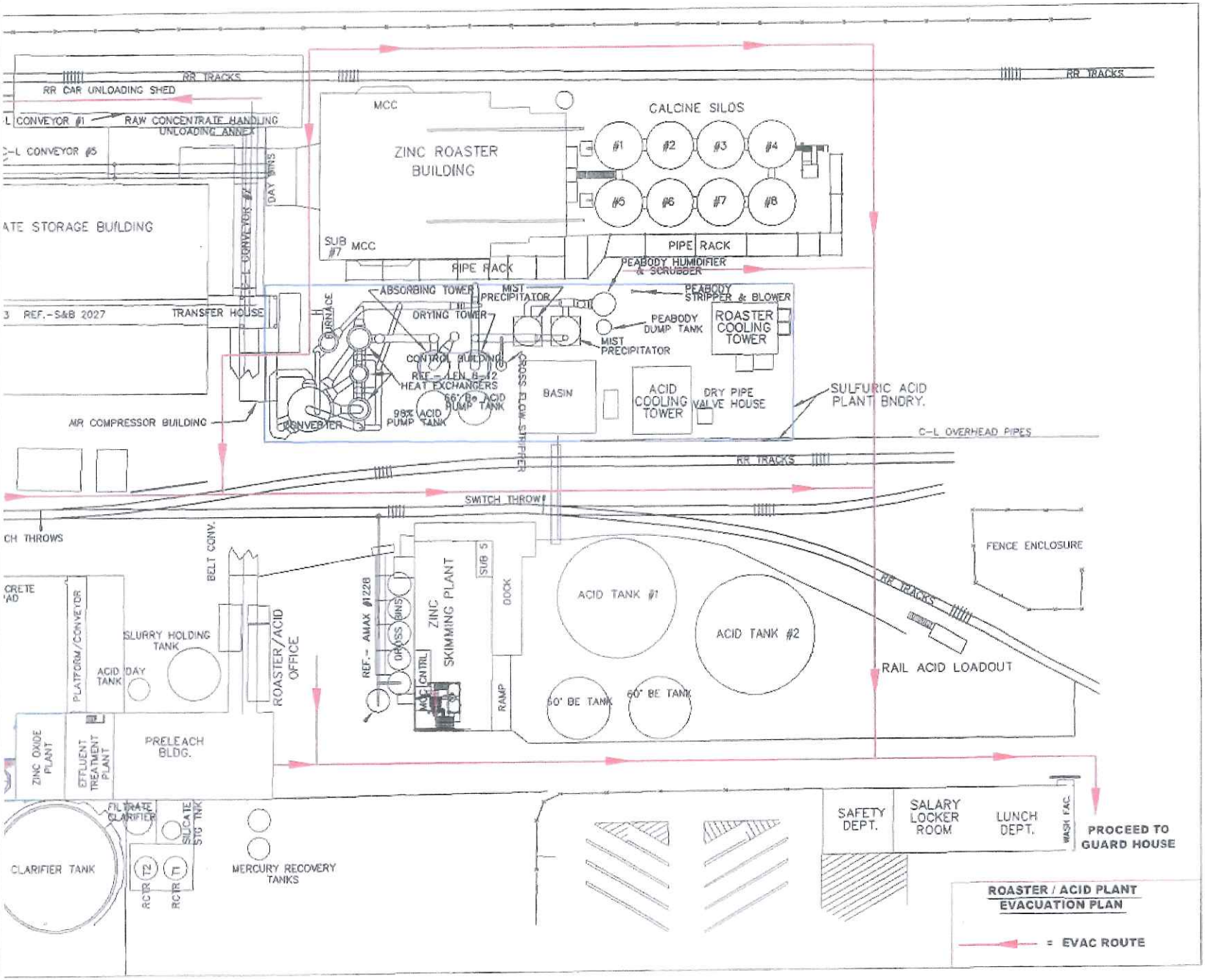
COPPER CAKE TANKS
LEACH DEPARTMENT
EVACUATION PLAN
= EVAC ROUTE
= ALTERNATE ROUTE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CONVEYOR #1
RAW CONCENTRATE HANDLING UNLOADING ANNEX
CONVEYOR #5
CONVEYOR #7
DAY BINS
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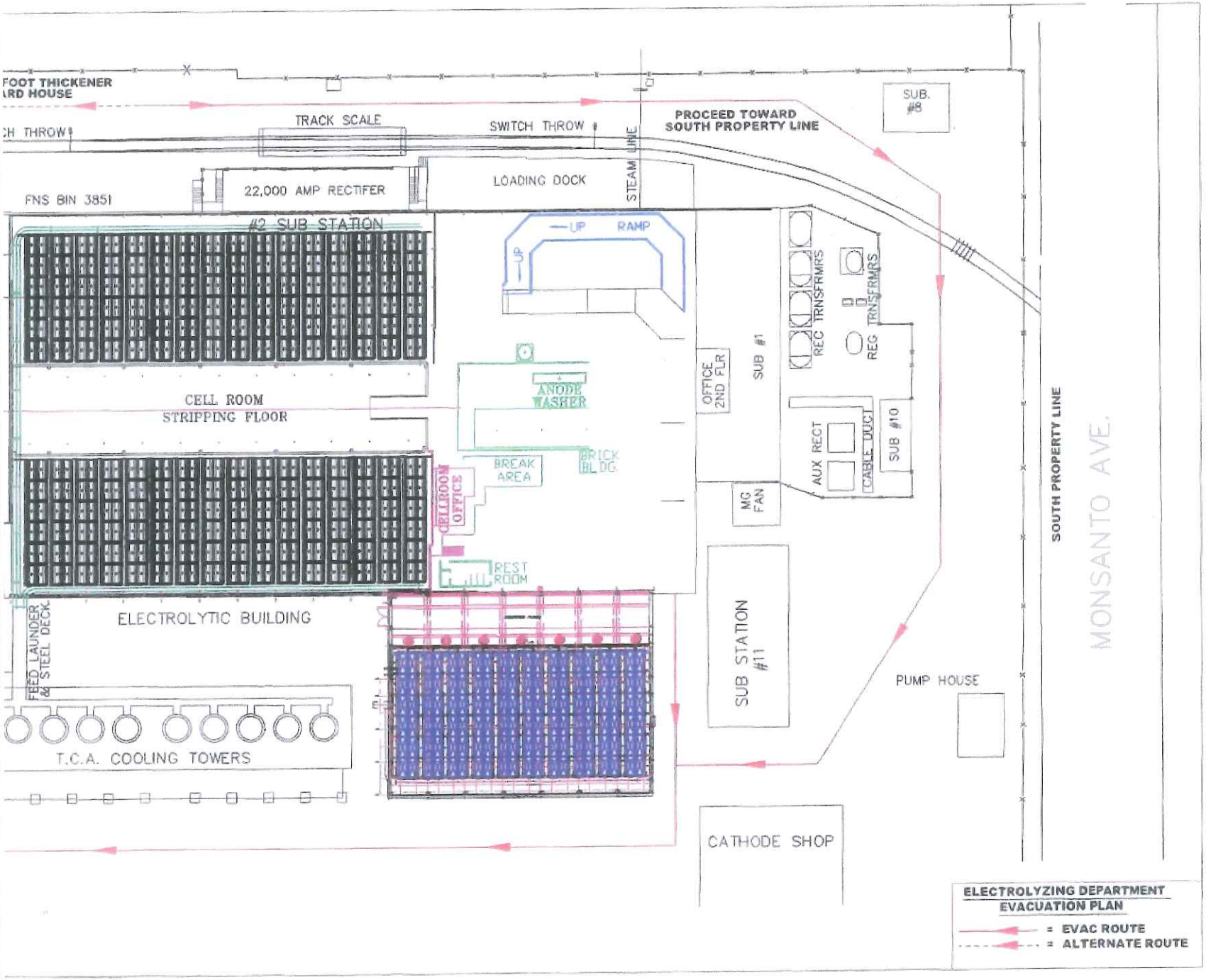
REF.-S&B 2027
TRANSFER HOUSE
AIR COMPRESSOR BUILDING
MCC
ZINC ROASTER BUILDING
CALCINE SILOS
#1
#2
#3
#4
#5
#6
#7
#8
SUB #7 MCC
PIPE RACK
PEABODY HUMIDIFIER & SCRUBBER
ABSORBING TOWER
MIST PRECIPITATOR
PEABODY STRIPPER & BLOWER
DRYING TOWER
PEABODY DUMP TANK
ROASTER COOLING TOWER
MIST PRECIPITATOR
CONTROL BUILDING
REF.-LEN B-12 HEAT EXCHANGERS
98% ACID PUMP TANK
CONVERTER
CROSS FLOW SHIFTER
BASIN
ACID COOLING TOWER
DRY PIPE VALVE HOUSE
SULFURIC ACID PLANT BNDRY.
C-L OVERHEAD PIPES
RR TRACKS
SWITCH THROWS
CH THROWS
BELT CONV.
FENCE ENCLOSURE
CRETE AD
PLATFORM/CONVEYOR
SLURRY HOLDING TANK
ACID DAY TANK
ROASTER/ACID OFFICE
REF.-AMAX #1228
DROSS BINS
CNTRL
ZINC SKIMMING PLANT
SUB S
DOCK
RAMP
ACID TANK #1
ACID TANK #2
60° BE TANK
60° BE TANK
RAIL ACID LOADOUT
ZINC OXIDE PLANT
EFFLUENT TREATMENT PLANT
PRELEACH BLDG.
FILTRATE CLARIFIER
SILICATE STG TNK
CLARIFIER TANK
RCTR
RCTR
MERCURY RECOVERY TANKS
SAFETY DEPT.
SALARY LOCKER ROOM
LUNCH DEPT.
WASH FAC
PROCEED TO GUARD HOUSE
ROASTER / ACID PLANT
EVACUATION PLAN
= EVAC ROUTE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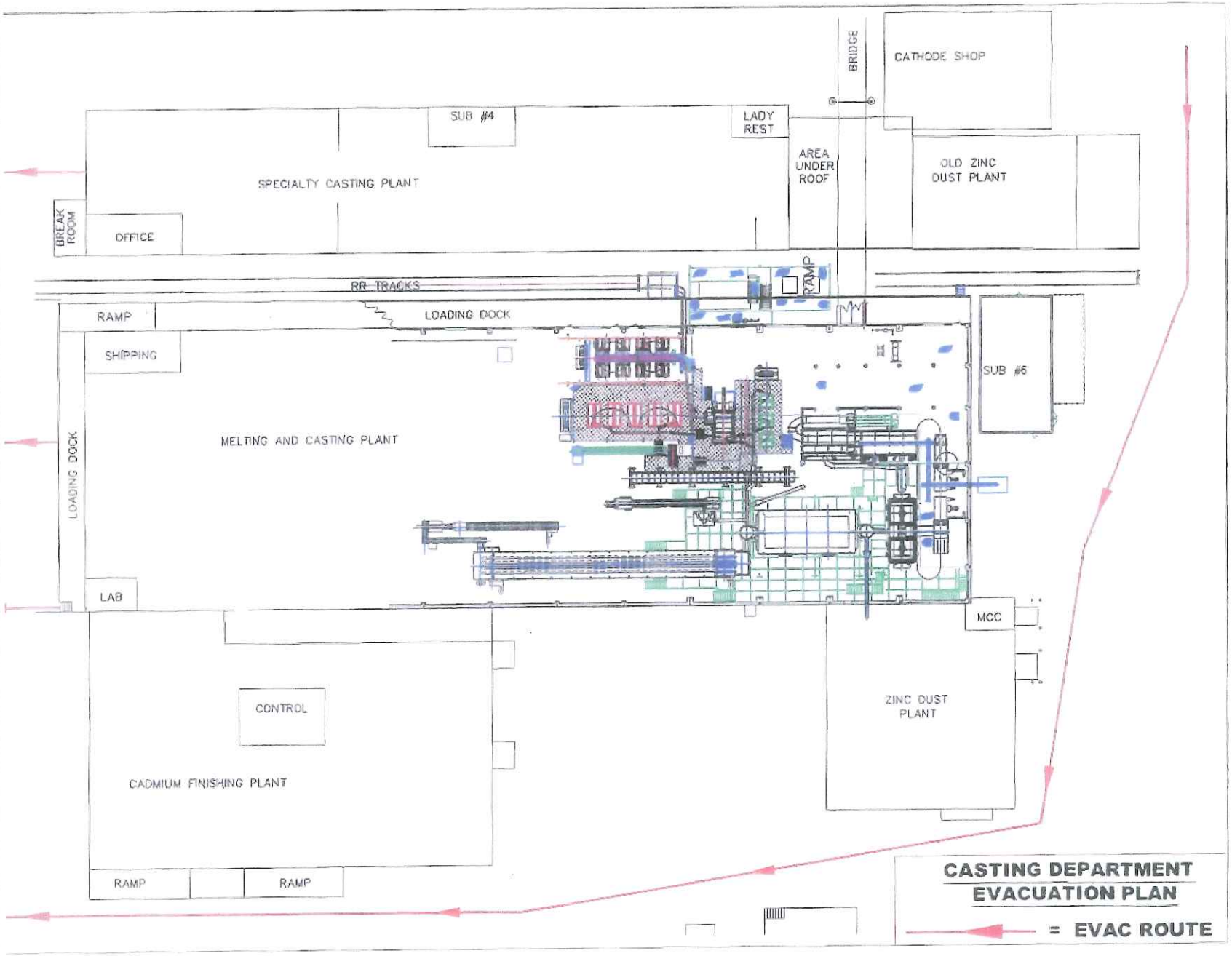
#8
STEAM LINE
FNS BIN 3851
22,000 AMP RECTIFER
LOADING DOCK
#2 SUB STATION
UP
RAMP
UP
REC TRNSFRMRS
REG TRNSFRMRS
OFFICE
2ND FLR
SUB #1
ANODE
WASHER
CELL ROOM
STRIPPING FLOOR
BREAK
AREA
BRICK
BLDG.
CELLROOM
OFFICE
MG
FAN
AUX RECT
CABLE DUCT
SUB #10
REST
ROOM
ELECTROLYTIC BUILDING
FEED LAUNDER
& STEEL DECK
SUB STATION
#11
PUMP HOUSE
T.C.A. COOLING TOWERS
CATHODE SHOP
SOUTH PROPERTY LINE
MONSANTO AVE.
ELECTROLYZING DEPARTMENT
EVACUATION PLAN
= EVAC ROUTE
= ALTERNATE ROUTE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CATHODE SHOP
SUB #4
LADY REST
AREA UNDER ROOF
OLD ZINC DUST PLANT
SPECIALTY CASTING PLANT
BREAK ROOM
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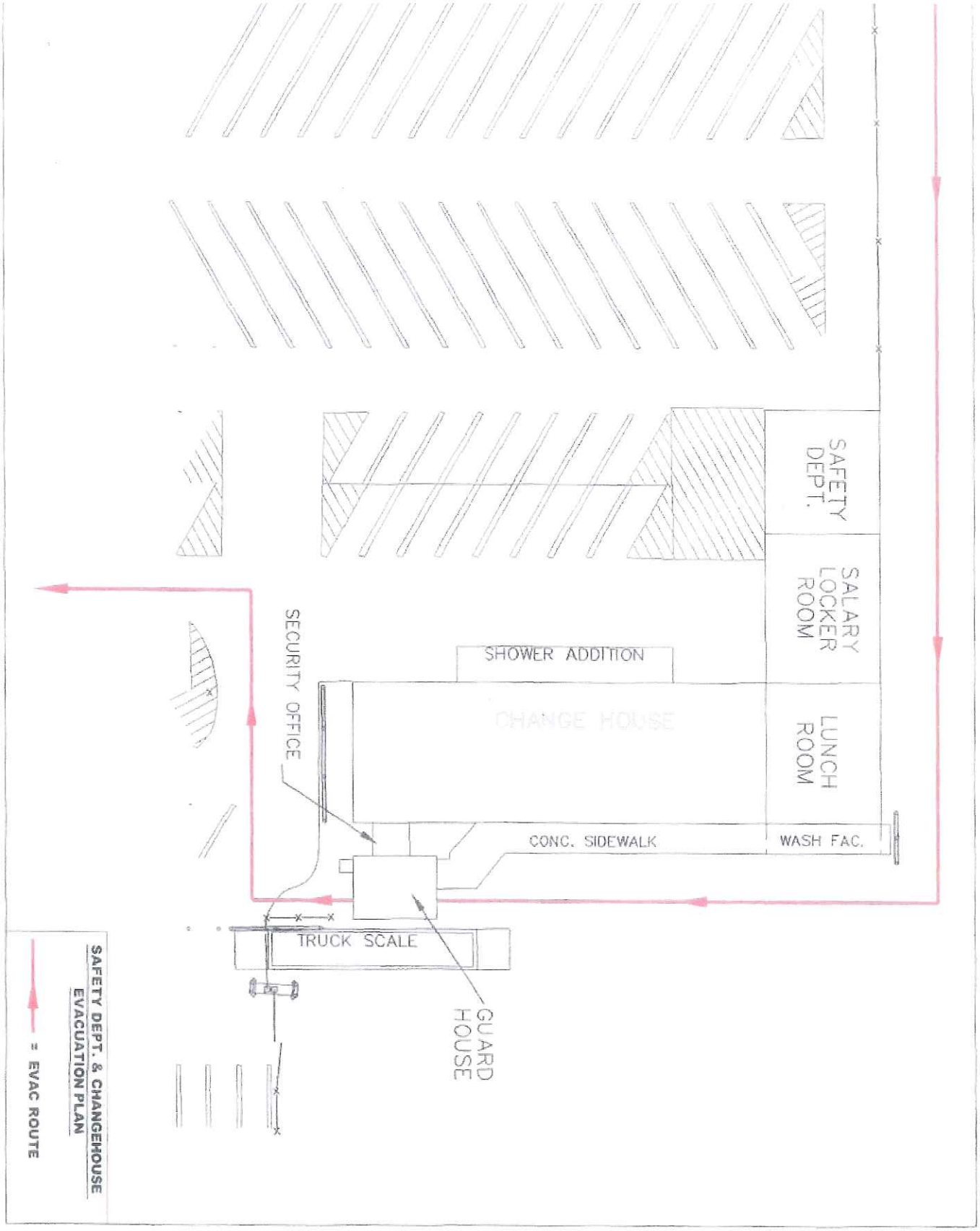
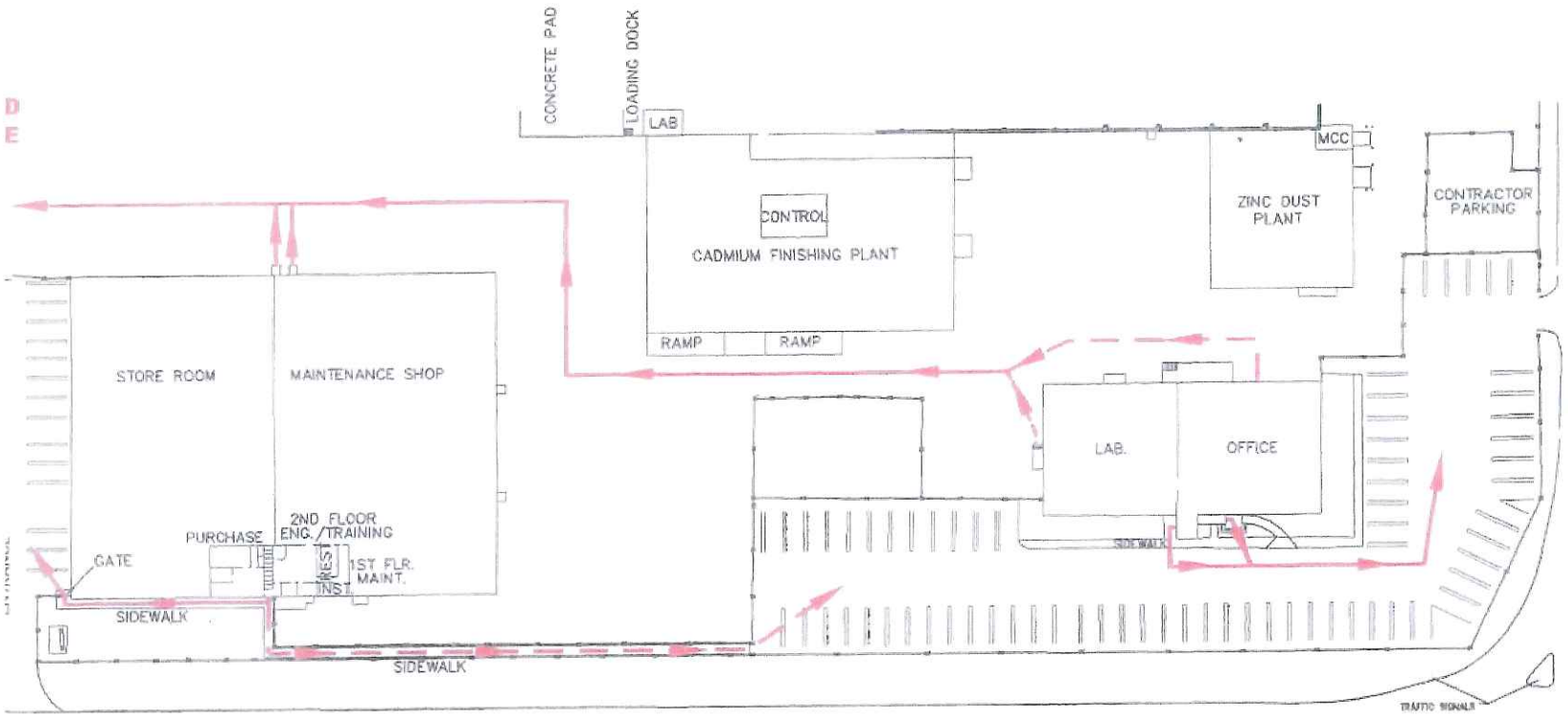
RAMP
LOADING DOCK
RAMP
SHIPPING
SUB #6
LOADING DOCK
MELTING AND CASTING PLANT
LAB
MCC
CONTROL
ZINC DUST PLANT
CADMIUM FINISHING PLANT
RAMP
RAMP
CASTING DEPARTMENT
EVACUATION PLAN
= EVAC ROUTE


SAFETY DEPT.
SALARY LOCKER ROOM
LUNCH ROOM
WASH FAC.
SHOWER ADDITION
CHANGE HOUSE
SECURITY OFFICE
CONC. SIDEWALK
TRUCK SCALE
GUARD HOUSE
SAFETY DEPT. & CHANGEHOUSE
EVACUATION PLAN
= EVAC ROUTE



ADMIN/ENGR/MAINT DEPARTMENT
EVACUATION PLAN

= EVAC ROUTE
= ALTERNATE ROUTE

Table 2
Spill Response Kit Locations and Contents
Big River Zinc Corporation
Sauget, Illinois

Spill Kit #	Name of SPCC Area	Location Description	Contents Code
1	Drum Storage Area # 2	Roaster Mechanics area outside the south outer wall	1
2	#5 Substation-pad mounted transformer	Inside doorway, SE corner of skimmings plant	1
3	Waste Oil # 2	Outside the NW corner of the oil house	1
4	Diesel & Gasoline dispensing area	Above ground tanks, located west of RR tracks and S of cafeteria	1
5	Waste Oil # 1	Outside of building at the SW corner of the vehicle shop	1
6	Substation # 13A & 13B Pad mounted transformer	Substation located N of special casting & S of the purified storage tanks	1
7	# 4 Substation transformer	Inside E wall of the special casting bldg. N of the T-metal furnace	1
8	Substation # 6, 6A & 6B, Pad mounted transformer	S end of the main casting bldg. Inside the fenced area of the transformer yard	1
9	Substation # 11, Pad mounted transformer	S of cell room unit # 3	1
10	Satellite Kerosene storage tank (winter only)	Outside SE corner of the Quonset storage	1
11	Substation # 1, Pad mounted transformer	Fenced transformer area, south end of cell room	1
12	Substation # 2, Pad mounted transformer	SE corner of fenced transformer yard, S end of cell room	1
13	Substation # 9, Pad mounted transformer	E side of ground level L/P, south of residue loading	1
14	Hazardous waste storage	Satellite stations for oil dry in vehicle shop and oil shed. Satellite station for parts washer in Vehicle shop	2

APPENDIX B

EQUIPMENT TABLES

Table 1
Location and Content of Fire Equipment Boxes
Big River Zinc Corporation
Sauget, Illinois

Box Number	Location
A	South of main Casting Dept. - East of the South Contracting Gate
B	South of the Vehicle Shop along the West fence line
C	East of Cell room along East fence line
D	East of Leach/Purification along East fence line
E	East of the Specialty Casting Building - West of Cell room Unit #3
F	At the Oil House
G	Northwest of the Acid Plant Converter, by the railroad tracks

Contents of Fire Equipment Boxes

QUANTITY	ITEM	DESCRIPTION	USE/CAPABILITIES
One	1 1/2 in. Nozzle	Brass nozzle, Combination, Adjusts to fog or straight stream	Enable user to adjust stream of water for the need at the time of a fire.
One	Reducer	Threaded reducer 2.5" by 1.5"	To connect hydrant outlet to the smaller fire hose
Two	Universal Spanner Wrenches	Cast aluminum 'C' shaped wrench.	Use to tighten reducer to hydrant and to connect fire hoses.
One	Hydrant Wrench	Adjustable combination hydrant and spanner wrench	Used to open the hydrant by turning the top post.
Three	Fire Hoses	50 foot sections of 1 1/2 in. industrial strength fire hose	Use to make hose capable of reaching a fire.
One	Axe	Wood handle fireman axe	Use to break open items so water can reach fire.

Contents Code 1	Contents	Use/capabilities
	6 ea. 3' x 10' adsorbent socks	Used to contain hazardous flowing material absorb it and preventing the contaminant from reaching sewer or groundwater.
	4 ea. Adsorbent Pillows	Used to directly absorb flowing contaminant
	75 ea. Absorbent mats	Used to directly absorb flowing contaminant and wipe down equipment
	10 ea. bags and ties	Used to contain used socks pillows, mats, and other contaminated material and transfer to Waste containers.

Contents Code 2	Contents	Use/capabilities
	Shovel	Pick up spilled solid waste and return to container
	Push Broom	Push waste into pile for removal with shovel
	Fire extinguisher	Extinguish fire
	Absorbent material	To place on dusty waste to keep it from becoming airborne and facilitate returning to container

Table 3
Fire Extinguisher Locations
Big River Zinc Corporation
Sauget, Illinois

DEPARTMENT	LOCATION	Location 2	BRZ #	B/C UNIT	B/C SITE	TYPE
Admin Bldg	SE Entry			3ZHFC	3ZHFD	20 lb ABC DRY CHEM
Admin Bldg	O/S Accounting			3ZHFR	3ZHFS	20 lb ABC DRY CHEM Cart-Op
Admin bldg	Sample Room			3ZHGO	3ZHG1	20 lb BC DRY CHEM Cart-OP
Admin Bldg	Lobby			3ZHFF	3ZHFG	5 lb ABC DRY CHEM
Admin Bldg	East Hallway	By Judy Tilk's office				
Admin Bldg	Basement Break room			3ZHFW	3ZHFX	5 lb ABC DRY CHEM Cart-OP
Admin Bldg	Lab 1 East			3ZHG2	3ZHG3	5 lb ABC DRY CHEM Cart-Op
Admin Bldg	Lab 2 East			3ZHG4	3ZHG5	5 lb ABC DRY CHEM Cart-Op
Admin Bldg	Computer Room			3ZHFH	3ZHFJ	17 lb Halon 1211
Admin Bldg	Computer Room			3ZHFK	3ZHFL	17 lb Halon 1211
Admin Bldg	Computer Room			3ZHFM	3ZHFN	17 lb Halon 1211
Admin Bldg	Computer Room			3ZHFP	3ZHFQ	17 lb Halon 1211
Admin Blding	Mail Room			3ZHFT	3ZHFV	15 lb Carbon Dioxide
Admin Blding	Lab 1 West		Q41	3ZHFY	3ZHFZ	15 lb Carbon Dioxide
Casting	@ Furnace	Under Baghouse	C7	3ZHGJ	3ZHGK	10 lb Carbon Dioxide
Casting	Skimming - Platform	Skimmings Downstairs	C33	3ZHF7	3ZHF8	15 lb Carbon Dioxide
Casting	Skimming- Platform	Skimmings Upstairs	C34	3ZHF9	3ZHFB	15 lb Carbon Dioxide
Casting	Electric Room 1	Zn Dust MCC North	C11	3ZHGX	3ZHGY	15 lb Carbon Dioxide
Casting	Electric Room 2	Zn Dust MCC West	C12	3ZHGZ	3ZHHO	15 lb Carbon Dioxide
Casting	Ship Office	Outside foremans office ?		3ZHG6	3ZHG7	20 lb Carbon Dioxide
Casting	Electric Room	MCC North	C9	3ZHGN	3ZHGP	20 lb Carbon Dioxide
Casting	Cadmium	Cd West Basement Wall	C31	3ZHHC	3ZHHD	20 lb Carbon Dioxide
Casting	East Building Platform	Die Cast Up	C24	3ZHJ2	3ZHJ3	20 lb Carbon Dioxide
Casting	Back Dr E maint	West Wall		3ZHJD	3ZHJF	20 lb Carbon Dioxide
Casting	Center Fl	Cathode Floor	C10	3ZHGV	3ZHGW	10 lb ABC Dry Chem
Casting	East Building North Door	Die cast North end	C26	3ZHHT	3ZHHV	20 lb ABC DRY CHEM
Casting	New Sub Station	East	C36	3ZHMR	3ZHMS	20 lb ABC DRY CHEM
Casting	Ship Office	Foremans Office	C1	3ZHG8	3ZHG9	20 lb ABC DRY CHEM Cart-Op
Casting	Ship Office	O/S Metal Analyzing room	C2	3ZHGB	3ZHGC	20 lb ABC DRY CHEM Cart-OP
Casting	By Scale	East Middle	C3	3ZHGD	3ZHGF	20 lb ABC DRY CHEM Cart-Op
Casting	SE corner	South East Corner	C6	3ZHGG	3ZHGH	20 lb ABC DRY CHEM Cart-Op
Casting	West wall	West Middle	C5	3ZHGQ	3ZHGR	20 lb ABC DRY CHEM Cart-Op
Casting	North end	M/L holding Conveyor	C4	3ZHGS	3ZHGT	20 lb ABC DRY CHEM Cart-Op
Casting	Dust Hopper	Zn Dust East wall	C13	3ZHH7	3ZHH8	20 lb ABC DRY CHEM Cart-Op
Casting	Cadmium	Cd south basement wall	C30	3ZHHF	3ZHHG	20 lb ABC DRY CHEM Cart-Op

Table 3
Fire Extinguisher Locations
Big River Zinc Corporation
Sauget, Illinois

DEPARTMENT	LOCATION	Location 2	BRZ #	B/C UNIT	B/C SITE	TYPE
Casting	Cadmium	Cd oxide room basement	C29	3ZHHH	3ZHHJ	20 lb ABC DRY CHEM Cart-Op
Casting	Cadmium office	Cd office	C28	3ZHHK	3ZHHL	20 lb ABC DRY CHEM Cart-Op
Casting	By W Ramp	Cd west door	C32	3ZHHM	3ZHHN	20 lb ABC DRY CHEM Cart-Op
Casting	Center Wall	Zn Dust Baghoust	C17	3ZHHP	3ZHHQ	20 Lb ABC DRY CHEM Cart-Op
Casting	East Bldg Center Hoist	T Metal pin press	C35	3ZHHW	3ZHHX	20 lb ABC DRY CHEM Cart-Op
Casting	East Bldg S Dr	Die Cast down	C23	3ZHJO	3ZHJ1	20 lb ABC DRY CHEM Cart-Op
Casting	Maintenance Warehouse	Old Zn dust 2nd floor E	C20	3ZHJG	3ZHJH	20 lb ABC DRY CHEM Cart-Op
Casting	Maintenance 2nd Level	Old Zn dust 2nd floor N	C21	3ZHJL	3ZHJM	20 lb ABC DRY CHEM Cart-Op
Casting	3rd Level Maintenance	Old Zn Dust 3rd floor	C22	3ZHJN	3ZHJP	20 lb BC DRY CHEM Cart-Op
Casting	Maintenance Whse	Old Zn dust north wall	C19	3ZHJQ	3ZHJR	20 lb BC DRY CHEM Cart -Op
Casting	Maintenance Front Door	Old Zn dust East wall	C18	3ZHJS	3ZHJT	20 lb BC DRY CHEM Cart-Op
Casting	Dust Hopper	Zn dust North Blowbin	C14	3ZHH1	3ZHH2	30 lb Class D Cart-Op
Casting	Dust Hopper	Zn dust South blowbin	C15	3ZHH3	3ZHH4	30 lb Class D Cart-Op
Casting	Dust Hopper	Zn dust basement	C16	3ZHH5	3ZHH6	30 lb Class D Cart-Op
Casting	Dust Hopper	Zn dust baghouse	C17	3ZHH9	3ZHHB	30 lb Class D Cart-Op
Casting	Electric room	MCC South	C8	3ZHGL	3ZHGM	20 lb Carbon Dioxide
Casting	New Sub Station	West	C37	3ZHMT	3ZHMV	20 lb ABC DRY CHEM
Casting	East Bldg W Wall	Die Cast west wall	C25	3ZHHY	3ZHHZ	20 lb ABC DRY CHEM Cart-Op
Cellroom	Unit 1 Substation	1st Floor, East of Store rm	M5	3ZHM3	3ZHM4	15 lb Carbon Dioxide
Cellroom	Unit 1 Substation	1st Floor North wall -Center		3ZHM5	3ZHM6	15 lb Carbon Dioxide
Cellroom	Unit 1 Substation	1st Floor North of Stairs		3ZHM7	3ZHM8	15 lb Carbon Dioxide
Cellroom	Unit 1 Substation	2nd Floor Top of Stairs		3ZHM9	3ZHMB	15 lb Carbon Dioxide
Cellroom	Unit 1 Substation	Electrician office - West side		3ZHMC	3ZHMD	15 lb Carbon Dioxide
Cellroom	Sub Station #8	By South Door		3ZHMP	3ZHMQ	20 lb Carbon Dioxide
Cellroom	Unit 1 Substation	2nd floof center, wheel unit		3ZHMF	3ZHMG	50 lb Carbon Dioxide
Cellroom	Unit 1 Substation	2nd floor North, wheel unit		3ZHMH	3ZHMJ	50 lb Carbon Dioxide
Cellroom	Unit 1 Substation	1st floor by drill press		3ZHM1	3ZHM2	20 lb ABC DRY CHEM cart-Op
Cellroom	Unit 1 Substation	2nd floor by west door		3ZHMK	3ZHML	20 lb ABC DRY CHEM Cart-OP
Cellroom	Unit 1 Substation	2nd floor, South center wall		3ZHMM	3ZHMN	20 lb ABC DRY CHEM Cart-Op
Cellroom	Elect room	MCC Below Office	Y7	3ZHLL	3ZHLM	10 lb Carbon Dioxide
Cellroom	Sub Station 2	East wall - North	M17	3ZHLV	3ZHLW	10 lb Carbon Dioxide
Cellroom	Sub Station 2	East Wall - Center	M18	3ZHLX	3ZHLY	10 lb Carbon Dioxide
Cellroom	Sub Station 2	East Wall - South	M19	3ZHLZ	3ZHMO	10 lb Carbon Dioxide
Cellroom	Prod Area	North - By steps		3ZHLS	3ZHLT	15 lb Carbon Dioxide
Cellroom	Sub 13	Outside East Door		3ZHJV	3ZHJW	20 lb Carbon Dioxide

Table 3
Fire Extinguisher Locations
Big River Zinc Corporation
Sauget, Illinois

DEPARTMENT	LOCATION	Location 2	BRZ #	B/C UNIT	B/C SITE	TYPE
Cellroom	Control room	W. Foremans Office	T6	3ZHLP	3ZHLN	20 lb ABC DRY CHEM
Cellroom	TCA Towers Ground N	Column	T14	3ZHLO	3ZHL1	20 lb ABC DRY CHEM Cart-Op
Cellroom	TCA Towers Ground N	By catwalk over hot sump	T14	3ZHL2	3ZHL3	20 lb ABC DRY CHEM Cart-Op
Cellroom	TCA Towers SW	Fan Floor		3ZHL4	3ZHL5	20 lb ABC DRY CHEM Cart-Op
Cellroom	TCA Towers NW	Fan Floor		3ZHL6	3ZHL7	20 lb ABC DRY CHEM Cart-Op
Cellroom	South	S. Basement	T8	3ZHLD	3ZHLF	20 lb ABC DRY CHEM Cart-Op
Cellroom	Center	Center Basement West	T9	3ZHLG	3ZHLH	20 lb ABC DRY CHEM Cart-Op
Cellroom	Center	Basement West		3ZHLJ	3ZHLK	20 lb ABC DRY CHEM Cart-Op
Cellroom	Control room	S. Cellroom	T3	3ZHLQ	3ZHLR	20 lb ABC DRY CHEM Cart-Op
Cellroom	Head Tankman Shack	Outside East Door	T12	3ZHQZ	3ZHRO	20 lb ABC DRY CHEM Cart-Op
Cellroom	TCA Shack	By Water fountain		3ZHL8	3ZHL9	5 lb ABC DRY CHEM Cart-Op
Cellroom	Unit # 3	Stripping floor - North		3FZSL	3FZSM	20 lb ABC DRY CHEM
Cellroom	Unit # 3	Stripping floor - Mid		3FZSK	3FZSJ	20 lb ABC DRY CHEM
Cellroom	Unit # 3	Stripping floor- South		3FZSH	3FZSG	20 lb ABC DRY CHEM
Cellroom	Unit # 3	Basement - South		3FZSQ	3FZSR	20 lb ABC DRY CHEM
Cellroom	Unit # 3	Basement - North		3FZSS	3FZST	20 lb ABC DRY CHEM
Cellroom	Sub # 11	West wall		3FZS4	3FZS5	20 lb Carbon Dioxide
Cellroom	Sub # 11	East wall		3FZSB	3FZSC	20 lb Carbon Dioxide
Cellroom	Sub # 11	North wall -West		3FZS6	3FZS7	20 lb Carbon Dioxide
Cellroom	Sub # 11	North wall - East		3FZS8	3FZS9	20 lb Carbon Dioxide
Cellroom	Clean-up cells	Southwest corner		3FZSN	3FZSP	20 lb ABC DRY CHEM
Cellroom	Gypsum removal towers	Top- Northeast corner		3ZHQX	3ZHQY	20 lb ABC DRY CHEM
Cellroom	North Basement	NE of high press. pump	L17	3ZHPK	3ZHPL	20 lb ABC DRY CHEM cart-Op
Engineering	Copy room	On floor by door		3ZHNN	3ZHNP	20 lb ABC DRY CHEM
Leach Purification	Weak Acid Leach	By # 1 tank, North by door		3ZHP5	3ZHP6	20 lb ABC DRY CHEM
Leach/Purification	MCC by paper press area	Inside MCC (Blueroom)		3ZHQS	3ZHQT	10 lb Carbon Dioxide
Leach/Purification	# 9 Substation	North End		3ZHP7	3ZHP8	15 lb Carbon Dioxide
Leach/Purification	# 9 Substation	South End	L31	3ZHP9	3ZHPB	15 lb Carbon Dioxide
Leach/Purification	O/S Maint			3ZHPH	3ZHPJ	15 lb Carbon Dioxide
Leach/Purification	1st Stage	Midway by air drier		3ZHQ0	3ZHQ1	15 lb Carbon Dioxide
Leach/Purification	Leach	South of #3 Leach Tank		3ZHPT	3ZHPV	20 lb Carbon Dioxide
Leach/Purification	2nd Stage	West pole by #1 Tank		3ZHQ4	3ZHQ5	20 lb Carbon Dioxide
Leach/Purification	2nd Stage	East of Presses		3ZHQ8	3ZHQ9	20 lb Carbon Dioxide
Leach/Purification	Eimco Floor	West of #3 Eimco	L1	3ZHQ6	3ZHQ7	20 lb ABC DRY CHEM

Table 3
Fire Extinguisher Locations
Big River Zinc Corporation
Sauget, Illinois

DEPARTMENT	LOCATION	Location 2	BRZ #	B/C UNIT	B/C SITE	TYPE
Leach/Purification	Residue	North of Floc Make-up tank		3ZHQL	3ZHQM	20 lb ABC DRY CHEM
Leach/Purification	1st Stage new presses	Southeast corner		3ZHQN	3ZHQP	20 lb ABC DRY CHEM
Leach/Purification	ZSM	MCC Blower room		3ZHPC	3ZHPD	20 lb ABC DRY CHEM Cart-Op
Leach/Purification	ZSM	South pole by locker	L32	3ZHPM	3ZHPN	20 lb ABC DRY CHEM cart-op
Leach/Purification	ZSM	Cd precip tanks by steps		3ZHPP	3ZHPQ	20 lb ABC DRY CHEM Cart-Op
Leach/Purification	Leach	South of # 1 Leach Tank		3ZHPR	3ZHPS	20 lb ABC DRY CHEM cart-op
Leach/Purification	Leach	N. Calcine bin top	L07	3ZHPW	3ZHPX	20 lb ABC DRY CHEM cart-op
Leach/Purification	1st Stage	1st Stage North	L8	3ZHPY	3ZHPZ	20 lb ABC DRY CHEM cart-op
Leach/Purification	1st Stage	1st Stage South	L09	3ZHQ2	3ZHQ3	20 lb ABC DRY CHEM cart-op
Leach/Purification	Residue MCC	Outside	L23	3ZHQB	3ZHQC	20 lb ABC DRY CHEM Cart-op
Leach/Purification	Residue	Control room	L24	3ZHQD	3ZHQF	20 lb ABC DRY CHEM Cart-Op
Leach/Purification	Residue Room	South Residue press		3ZHQG	3ZHQH	20 lb ABC DRY CHEM cart-op
Leach/Purification	Residue Room	North press control panel		3ZHQJ	3ZHQK	20 lb ABC DRY CHEM Cart-Op
Leach/Purification	Foremans Office	South wall	L14	3ZHQQ	3ZHQR	20 lb ABC DRY CHEM cart-Op
Leach/Purification	Press paper area	South	L15	3ZHQV	3ZHQW	20 lb ABC DRY CHEM Cart-OP
Leach/Purification	Eimco Sump	East of deep leg pit	L18	3FZRV	3FZRT	
Leach/Purification	Southwest Leach-down	S.W. of Leach tanks	L2	3FZRY	3FZRZ	
Leach/Purification	Inside North door	North of # 3 Leach Tank	L3	3FZSO		
Leach/Purification	East of Classifier/Ball mill	On pole by ramp	L4	3FZRW		
Maintenance	Leach/Purification	Northwest of Maint. Shack		3ZHPF	3ZHPG	20 lb ABC DRY CHEM
Maintenance	Casting-Near back door	Mounted to work bench		3ZHJB	3ZHJC	20 lb ABC DRY CHEM Cart-Op
Maintenance	Cadmium	Maintenance shop		3ZHHR	3ZHHS	5 lb ABC DRY CHEM Cart-OP
Maintenance	Cellroom Maintenance area	Northwest of welding booth		3ZHLB	3ZHLC	20 lb ABC DRY CHEM Cart-Op
Maintenance	Gas pumps	west side		3ZHKP	3ZHKQ	20 lb ABC DRY CHEM Cart-Op
Maintenance	Main Compressor Room	Near West door		3ZHK5	3ZHK6	20 lb Carbon Dioxide
Maintenance	Main Compressor Room	Between #7 & 8 Air Control		3ZHK3	3ZHK4	20 lb ABC DRY CHEM Cart-Op
Maintenance	Oil house	North side		3ZHK7	3ZHK8	20 lb ABC DRY CHEM
Maintenance	Oil house	South side		3ZHK9	3ZHKB	20 lb ABC DRY CHEM Cart-Op
Maintenance	Quanset Hut	Front door		3ZHJ4	3ZHJ5	20 lb ABC DRY CHEM Cart-Op
Maintenance	Quanset hut	Center		3ZHJ6	3ZHJ7	20 lb ABC DRY CHEM Cart-Op
Maintenance	Quanset hut	Back door		3ZHJ8	3ZHJ9	20 lb ABC DRY CHEM Cart-Op
Maintenance	Vehicle Shop	By bulk oil drum		3ZHN4	3ZHN5	15 lb Carbon Dioxide
Maintenance	Pump Shop	By parts wash	M27	3ZHND	3ZHNF	15 lb Carbon Dioxide
Maintenance	CRNE AP308	CP5		3ZHMW	3ZHMX	2.5 ABC DRY CHEM
Maintenance	SW Pole	East of hand wash area	M24	3ZHN6	3ZHN7	20 lb ABC DRY CHEM Cart-OP

Table 3
Fire Extinguisher Locations
Big River Zinc Corporation
Sauget, Illinois

DEPARTMENT	LOCATION	Location 2	BRZ #	B/C UNIT	B/C SITE	TYPE
Maintenance	Vehicle Shop	South door	M25	3ZHN8	3ZHN9	20 lb ABC DRY CHEM Cart-Op
Maintenance	Welding Shop	Near South door	M26	3ZHNB	3ZHNC	20 lb ABC DRY CHEM Cart-Op
Maintenance	Instrument Shop	South wall		3ZHNJ	3ZHNK	20 lb ABC DRY CHEM Cart-Op
Maintenance	Crane CP1	Drott Go-Devil		3ZHNO	3ZHN1	5 lb ABC DRY CHEM
Maintenance	Crane 2			3ZHMY	3ZHMZ	5 lb ABC DRY CHEM Cart-Op
Maintenance	Cart CS7			3ZHN2	3ZHN3	5 lb ABC DRY CHEM Cart-Op
Maintenance	Office	Northwest Corner		3ZHNL	3ZHNM	5 lb ABC DRY CHEM Cart-OP
Maintenance	Near north wall on workbench	West of horrizontal mill		3ZHNG	3ZHNH	30 lb Class D Cart-Op
Maintenance	Roast/Acid maint shack	Inside on column		3ZHCF	3ZHCG	15 lb Carbon Dioxide
Pre-Leach	By Maint.			3ZHBS	3ZHBT	15 lb Carbon Dioxide
Pre-Leach	N By Steps	WT Vaccum pump at steps	R31	3ZHBX	3ZHBY	15 lb Carbon Dioxide
Pre-Leach	O/S Oil HS	Oil House	R17	3ZHCH	3ZHCJ	20 lb ABC DRY CHEM
Pre-Leach	Conveyor			3ZHBV	3ZHBW	20 lb ABC DRY CHEM Cart -OP
Pre-Leach	Pump room Basement			3ZHBZ	3ZHCO	20 lb ABC DRY CHEM Cart-Op
Pre-Leach	By Hopper			3ZHC3	3ZHC4	20 lb ABC DRY CHEM Cart-Op
Pre-Leach	Line Cnter			3ZHC5	3ZHC6	20 lb ABC DRY CHEM Cart-Op
Pre-Leach	Line East			3ZHC7	3ZHC8	20 lb ABC DRY CHEM Cart--Op
Pre-Leach	Pump House			3ZHCC	3ZHCD	20 lb ABC DRY CHEM Cart-Op
Pre-Leach	By sub # 7	East of Pre heater on Post	R33	3ZHCK	3ZHCL	20 lb ABC DRY CHEM Cart-Op
Pre-Leach	Control room	Control room	R21	3ZHC1	3ZHC2	20 lb Carbon Dioxide
Purchasing	Store room	Southwest Corner	S3	3ZHNS	3ZHNT	20 lb ABC DRY CHEM Cart-Op
Purchasing	Store room	West pole	S2	3ZHNV	3ZHNW	20 lb ABC DRY CHEM cart-Op
Purchasing	Store room	East pole		3ZHNX	3ZHNY	20 lb ABC DRY CHEM Cart-Op
Purchasing	Hallway	Between restrooms		3ZHNQ	3ZHNR	5 lb ABC DRY CHEM Cart-Op
Roast/ Acid	Ore shed - Center	Conc. Storage center	R2	3ZHCT	3ZHCV	15 lb Carbon Dioxide
Roast/Acid	Acid plant	Coolong Tower	R20	3ZHCP	3ZHCQ	20 lb ABC DRY CHEM Cart-Op
Roast/Acid	Acid Control Room	Acid Control	R19	3ZHCM	3ZHCN	15 lb Carbon Dioxide
Roast/Acid	SE Substation	Motor Control Room-east	R15	3ZHD4	3ZHD5	15 lb Carbon Dioxide
Roast/Acid	Elect Room SW	Motor Control Room-South	R18	3ZHD8	3ZHD9	15 lb Carbon Dioxide
Roast/Acid	Sub Station # 7	Motor Control Room-West	R16	3ZHDB	3ZHDC	15 lb Carbon Dioxide
Roast/Acid	Sub Station # 7	Substation 7	R34	3ZHDD	3ZHDF	15 lb Carbon Dioxide
Roast/Acid	Roaster Southeast			3ZHDL	3ZHDM	15 lb Carbon Dioxide
Roast/Acid	Roaster East Stair			3ZHDQ	3ZHDR	15 lb Carbon Dioxide
Roast/Acid	Roof Center	Hoist house 5th	R5	3ZHF5	3ZHF6	15 lb Carbon Dioxide
Roast/Acid	Ore Shed North	Conc. Storage north	R3	3ZHCR	3ZHCS	20 lb ABC DRY CHEM Cart-OP

Table 3
Fire Extinguisher Locations
Big River Zinc Corporation
Sauget, Illinois

DEPARTMENT	LOCATION	Location 2	BRZ #	B/C UNIT	B/C SITE	TYPE
Roast/Acid	Ore Shed South	Conc. Storage South	R1	3ZHCW	3ZHCX	20 lb ABC DRY CHEM Cart-OP
Roast/Acid	Ore Shed Train Dock NW	Conc. unloading SW	R25	3ZHCY	3ZHCZ	20 lb ABC DRY CHEM Cart-OP
Roast/Acid	Ore Shed Train Dock SW	Conc. Unloading E	R26	3ZHDO	3ZHD1	20 lb ABC DRY CHEM Cart-Op
Roast/Acid	Ore Shed Train Dock SE	Conc. Unloading- East	R27	3ZHD2	3ZHD3	20 lb ABC DRY CHEM Cart-OP
Roast/Acid	Roaster North	Roaster 1st Flr Windbox	R14	3ZHD6	3ZHD7	20 lb ABC DRY CHEM Cart-Op
Roast/Acid	Roaster West Stairs	Air Compressor Building	R35	3ZHDG	3ZHDH	20 lb ABC DRY CHEM Cart-Op
Roast/Acid	Roaster SW	Roaster 2nd Flr mid-West	R13	3ZHDJ	3ZHDK	20 lb ABC DRY CHEM Cart-Op
Roast/Acid	Roaster Center			3ZHDN	3ZHDP	20 lb ABC DRY CHEM Cart-Op
Roast/Acid	Roaster SE	Roaster 3rd floor-east	R9	3ZHDS	3ZHDT	20 lb ABC DRY CHEM Cart-OP
Roast/Acid	Roaster SW	Roaster 3rd floor-west	R8	3ZHDV	3ZHDW	20 lb ABC DRY CHEM Cart-OP
Roast/Acid	By Hoppers			3ZHDX	3ZHDY	20 lb ABC DRY CHEM Cart-Op
Roast/Acid	By Hoppers	Roaster 4th floor	R6	3ZHDZ	3ZHFO	20 lb ABC DRY CHEM Cart-Op
Roast/Acid	By Hoppers	Roaster 4th floor	R7	3ZHF1	3ZHF2	20 lb ABC DRY CHEM Cart-Op
Roast/Acid	Bin control	Shaker Screne room	R29	3ZHF3	3ZHF4	20 lb ABC DRY CHEM Cart-Op
Roast/Acid	Foremans Office	Foremans office	R36	3ZHC9	3ZHCB	5 lb ABC DRY CHEM
Roast/Acid	Spill Kit(Hazardous Waste)	Sludge Pad Sump		3ZHRS	3ZHRT	15 lb Carbon Dioxide
Roast/Acid	Spill Kit(Hazardous Waste)	Sludge Pad Sump		W-878545		20lb Carbon Dioxide
Safety	Wash room			3ZHKW	3ZHKX	20 lb ABC DRY CHEM
Safety	Store room			3ZHKY	3ZHKZ	20 lb ABC DRY CHEM
Security	Lunchroom	South wall by light switch	S09	3ZHKT	3ZHKV	20 lb ABC DRY CHEM
Security	Mens Locker room	Dirty side E wall by coat rack	S10	3ZHP3	3ZHP4	15 lb Carbon Dioxide
Security	Mens locker room	W wall next to boiler room	S12	3ZHNZ	3ZHPO	20 lb ABC DRY CHEM Cart-Op
Security	Mens locker room	S Wall next to thermostat	S11	3ZHP1	3ZHP2	20lb ABC DRY CHEM Cart-Op
Security	Guard shack lobby	North wall clock alley	S16	3ZHKR	3ZHKS	20 lb ABC DRY CHEM Cart-Op
Security	Womens locker room	S wall in hall/salary side	S15	3ZHJZ	3ZHKO	20 lb ABC DRY CHEM
Security	Womens Locker room	N wall in hall/hourly side	S14	3ZHK1	3ZHK2	5 lb ABC DRY CHEM
Spare	Safety Storage			3ZHRJ	3ZHRK	10 lb ABC Dry Chem
Spare	Safety storage			3ZHR1	3ZHR5	20 lb ABC DRY CHEM
Spare	Safety Storage			3ZHR2	3ZHR5	20 lb ABC DRY CHEM
Spare	Safety Storage			3ZHR3	3ZHR5	20 lb ABC DRY CHEM
Spare	Safety Storage			3ZHR4	3ZHR5	20 lb ABC DRY CHEM
Spare	Safety Storage			3ZHR6	3ZHRC	20 lb ABC DRY CHEM Cart_op
Spare	Safety Storage			3ZHRT	3ZHRC	20 lb ABC DRY CHEM Cart-Op
Spare	Safety Storage			3ZHR9	3ZHRC	20 lb ABC DRY CHEM Cart-Op

Table 3
Fire Extinguisher Locations
Big River Zinc Corporation
Sauget, Illinois

DEPARTMENT	LOCATION	Location 2	BRZ #	B/C UNIT	B/C SITE	TYPE
Spare	Safety Storage			3ZHRB	3ZHRC	20 lb BC DRY CHEM Cart-Op
Spare	Safety Storage			3ZHRD	3ZHRF	30 lb Class D Cart-Op
Spare	Safety Storage			3ZHRG	3ZHRH	17 lb Halon 1211
Spare	Safety Storage			3ZHRQ	3ZHRR	2.5 Gallon Pressurized Water
Spare	Safety Storage			3ZHR8	3ZHRC	20 lb ABC DRY CHEM Cart-Op
Spare	Safety Storage			3ZHRL	3ZHRM	5 lb ABC DRY CHEM
Test Plant	Pilot Bay	By telephone		3ZHKK	3ZHKL	20 lb Carbon Dioxide
Test Plant	Annex	By East door		3ZHKC	3ZHKD	20 lb ABC DRY CHEM
Test Plant	Zinc Powder			3ZHKF	3ZHKG	20 lb ABC DRY CHEM
Test Plant	Office	By Restroom		3ZHKM	3ZHKN	5 lb ABC DRY CHEM cart-OP
Test Plant	Zinc Powder	Platform		3ZHKH	3ZHKJ	30 lb Class D Cart-Op

BIG RIVER ZINC CORPORATION
2401 MISSISSIPPI AVENUE
SAUGET, ILLINOIS 62201-1078

TEL: 618-274-5000
FAX: 618-274-4444

February 13, 2008

Mr. Todd Brown
U.S. EPA Region 5
77 West Jackson Boulevard, LR-8J
Chicago, Illinois 60604

Mr. Brown:

Please consider this correspondence as a response to the January 17, 2007 Notice of Violation received by Big River Zinc.

Regarding your allegation that Big River was "engaged in storing hazardous waste without a permit", we ask you to consider these facts:

1. The debris generated from the demolition of the leach building was sampled and analyzed by TCLP method to determine its ultimate disposal status. Not all was, of course, determined to be hazardous, so as test results of areas (piles) came back, they were labeled if they were in fact hazardous, and segregated for timely disposal. The area they were staged in was, in fact the same area where all concentrates were historically brought into the plant. The concrete and wood debris leaving as hazardous waste needed to be crushed to meet landfill specifications, so it could not be staged in the leach area due to the demolition activities. In your narrative of the BRZ inspection, you noted the concentrate pad "drains into a holding pond associated with BRZ's waste water treatment system". For the record there is no longer a holding pond, there is a holding tank The concentrate pad is at a lower elevation than the storm water tank, so any run off from the piles would be contained, and have to be pumped in order to leave the concentrate pad. This is why we at BRZ feel we were in compliance with handling the material until it left as a manifested hazardous waste.

   You noted in your report that signs were in place designating those materials that were hazardous, the date they were staged and a date 90 days later. All of these materials were disposed of in less than 90 days from the time they became known as hazardous until they were properly land filled. Attachment "A" contains documentation of the hazardous waste pile removal along with copies of the hazardous waste manifests and certificates of disposal.

2. BRZ's Hazardous Waste Contingency Plan has been reviewed for completeness and accuracy to ensure compliance with applicable Federal and State regulations. After review it was determined some items were not as easily accessible as they could have been, so the decision was made to revise and reissue the Plan. We will forward a copy of the old plan and the new issue to you for your review no later than 31 March, 2008.

3. The NOV claims that Big River Zinc did not have a written description of the type and amount of training given at Big River Zinc. At this time, absent a production work force, BRZ still maintains four employees who are current on HM Transportation Management and Hazardous Waste Management as documented in Attachment "B." These certificates show what type of training was involved and when it occurred. Training certificates showing the type of training and time of training for all the contractor personnel working on the demolition occurring at Big River Zinc at the time were displayed for the inspector.

   Before the plant ceased operation, Big River Zinc conducted training using the contingency plan, memos and procedures written for the training. The records for this training were displayed for the inspector. This training will be more formalized for use in training Big River Zinc employees when they return to work and thereafter. A copy of the revised training program will be sent along with the revised Contingency Plan.

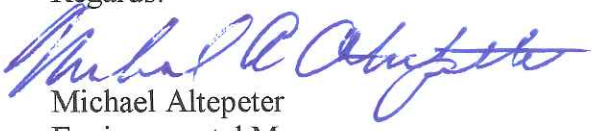
   Big River Zinc had conducted annual HM181 training for those Supervisors who supervise the handling of hazardous material and any workers who handle hazardous material, although documents concerning this training were not presented to the inspector during the inspection.

   We believe this meets the intent of 40CFR262.34(a)(iv) and 40CFR265.16.

4. Inspection of the Universal Waste Storage Building found a number of fluorescent tubes that had not been placed in shipping containers and marked as Universal Waste Lamps. Most of these lamps were removed from the Leach building prior to demolition to keep them out of the waste debris stream. Our thought process was to isolate them in this properly designated area until they could be properly disposed of by a licensed disposal facility. The same can be said of the waste batteries that were not labeled as universal waste; they were removed from old electric carts that were being scrapped, and placed in the universal waste storage building awaiting pick up by a licensed recycler. No other material resided in the Universal Waste Storage Building except Universal Waste. Attachment "C" shows the manifests for the shipment of the lamps and the batteries.

If you require additional information, please don't hesitate to contact me at 618.274.5000 extension 194, or email me at maltepeter@bigriverzinc.com.

Regards:



Michael Altepeter
Environmental Manager
Big River Zinc Corp.

ATTACHMENT "A"

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number: ILD062444435	2. Page 1 of 1	3. Emergency Response Phone: 618-274-5000	4. Manifest Tracking Number: 002774351 JJK

5. Generator's Name and Mailing Address: BIG RIVER ZINC, 2401 MISSISSIPPI AVE, SAUGET, IL 62201
Generator's Site Address (if different than mailing address)
Generator's Phone: 618 274-5000

6. Transporter 1 Company Name: Beelman Truck Co. — U.S. EPA ID Number: ILR000127236
7. Transporter 2 Company Name — U.S. EPA ID Number

8. Designated Facility Name and Site Address: MICHIGAN DISPOSAL WASTE TREATMENT PLANT, 49350 NORTH I-94 SERVICE DRIVE, BELLEVILLE, MI 48111 — U.S. EPA ID Number: MID000724831
Facility's Phone: (800) 592-5489

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. HAZARDOUS WASTE, SOLID, N.O.S., (CADMIUM), 9, NA3077, PGIII, ERG#171, A60761101NDI	1	DT	51000	P	D006
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
A: S0761101NDI C:
B: D:
(1-11 CONCRETE)

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Mickey Hiltunen — Signature: [signature] — Month 12 Day 14 Year 07

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Bob Kirkman 612512029 — Signature: Bob Kirkman — Month 12 Day 12 Year 07
Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name — Signature — Month Day Year

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

CERTIFICATE OF DISPOSAL

This certificate is to verify the wastes specified on Manifest # 002774351JJK

have been properly disposed of in accordance with all local, state and federal regulations.

"Disposed of" means either: 1) Burial or 2) Processed as specified in 40 CFR et sea.

FACILITY NAME: *(Please check one)*

☑ Michigan Disposal Waste Treatment Plant (EPA I.D. # MID000724831)

☐ Wayne Disposal, Inc. (EPA I.D. # MID048090633)

ADDRESS: 49350 N. I-94 Service Drive
Belleville, Michigan 48111

PHONE NUMBER: 1-800-592-5489

FAX NUMBER: 1-800-593-5329

Authorized Signature:

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: ILD062444435
2. Page 1 of: 1
3. Emergency Response Phone: 618-274-5888
4. Manifest Tracking Number: 002774353 JJK

GENERATOR

5. Generator's Name and Mailing Address: BUS WHEEL ZINC
2401 MISSISSIPPI AVE
SAUGET, IL 62201
Generator's Phone: 618 274-5888
Generator's Site Address (if different than mailing address)

6. Transporter 1 Company Name: Wills Trucking
U.S. EPA ID Number: OHD068913409

7. Transporter 2 Company Name
U.S. EPA ID Number

8. Designated Facility Name and Site Address: MICHIGAN DISPOSAL WASTE TREATMENT PLANT
49350 NORTH I-94 SERVICE DRIVE
BELLEVILLE, MI 48111
Facility's Phone: (888) 592-5489
U.S. EPA ID Number: MID000724831

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. HAZARDOUS WASTE, SOLID, N.O.S., (CADMIUM), 9, NA3077, PGIII, ERG#171, 0076116INDI	001	BT	45360	P	D006		
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information
A: 0076116INDI C:
B: D: (FOR CONCRETE) TRL #460

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Anthony Thomas
Signature: Anthony Thomas
Month: 10 Day: 09 Year: 07

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Lou Paulus
Signature: Lou Paulus
Month: 10 Day: 09 Year: 07

Transporter 2 Printed/Typed Name
Signature
Month: Day: Year:

DESIGNATED FACILITY

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone

18c. Signature of Alternate Facility (or Generator)
Month: Day: Year:

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 18a
Printed/Typed Name
Signature
Month: Day: Year:

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete

DESIGNATED FACILITY TO GENERATOR

CERTIFICATE OF DI

This certificate is to verify the wastes specified on Manifest # 002774353 JJK

have been properly disposed of in accordance with all local, state and federal regulations.

"Disposed of" means either: 1) Burial or 2) Processed as specified in 40 CFR et sea.

FACILITY NAME: *(Please check one)*

☑ Michigan Disposal Waste Treatment Plant (EPA I.D. # MID000724831)

☐ Wayne Disposal, Inc (EPA I.D. # MID[illegible])

ADDRESS: 49350 N. I-94 Service Drive
Belleville, Michigan 48111

PHONE NUMBER: 1-800-592-5489

FAX NUMBER: 1-800-593-5329

Authorized Signature: _____

THE ENVIRONMENTAL QUALITY COMPANY 49350 N. I-94 SERVICE DRIVE BELLEVILLE MICHIGAN 48111

FORM1020 (3/96)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: ILD062444435
2. Page 1 of: 1
3. Emergency Response Phone: 618-274-5000
4. Manifest Tracking Number: 002774356 JJK

5. Generator's Name and Mailing Address: BIG RIVER ZINC, 2401 MISSISSIPPI AVE, SAUGET, IL 62201
Generator's Site Address (if different than mailing address)
Generator's Phone: 618 274-5000

6. Transporter 1 Company Name: [illegible] — U.S. EPA ID Number: I[illegible]

7. Transporter 2 Company Name — U.S. EPA ID Number

8. Designated Facility Name and Site Address: MICHIGAN DISPOSAL WASTE TREATMENT PLANT, 49350 NORTH I-94 SERVICE DRIVE, BELLEVILLE, MI 48111 — U.S. EPA ID Number: MID000724831
Facility's Phone: (800) 592-5489

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. HAZARDOUS WASTE, SOLID, N.O.S., (CADMIUM), 9, NA3077, PGIII, ERG#171, BG0761101MDI	001	DT	46146	P	D006 D004		
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information
A: BG0761101MDI C:
B: 3073034MDI (FOR CONCRETE) TR# 3835

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Anthony Thoma — Signature: Anthony Thoma — Month 10 Day 5 Year 07

16. International Shipments ☐ Import to U.S ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name — Signature — Month Day Year
Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☒ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest [illegible] BAKE [illegible] 10/8/07
Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name — Signature — Month Day Year

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete. — DESIGNATED FACILITY TO GENERATOR

CERTIFICATE OF DISPOSAL

This certificate is to verify the wastes specified on Manifest # 007743527 JK

have been properly disposed of in accordance with all local, state and federal regulations

"Disposed of" means either: 1) Burial or 2) Processed as specified in 40 CFR et seq

FACILITY NAME: *(Please check one)*

☑ Michigan Disposal Waste Treatment Plant
(EPA I.D. # MID000724831)

☐ Wayne Disp... Inc.
(EPA I.D. ...)

ADDRESS: 49350 N. I-94 Service Drive
Belleville, Michigan 48111

PHONE NUMBER: 1-800-592-5489

FAX NUMBER: 1-800-593-5329

Authorized Signature: _____

LAH-48110

5147

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: ILD062444435
2. Page 1 of 1
3. Emergency Response Phone: 618-274-5000
4. Manifest Tracking Number: 002774355 JJK

5. Generator's Name and Mailing Address: BIG RIVER ZINC
2401 MISSISSIPPI AVE
SAUGET, IL 62201

Generator's Site Address (if different than mailing address)

Generator's Phone: 618 274-5000

6. Transporter 1 Company Name: Beelman Truck Co — U.S. EPA ID Number: ILR000135236

7. Transporter 2 Company Name — U.S. EPA ID Number

8. Designated Facility Name and Site Address: MICHIGAN DISPOSAL WASTE TREATMENT PLANT
49350 NORTH I-94 SERVICE DRIVE
BELLEVILLE, MI 48111

U.S. EPA ID Number: MID000724831

Facility's Phone: (800) 592-5489

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. HAZARDOUS WASTE, SOLID, N.O.S., (CADMIUM), 9, NA3077, PGIII, ERG#171, 0G0761101MDI	001	DT	52,500 / 42,400	P	D006
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information

A: G0761101MDI C:
B: D:

(FOR CONCRETE)

TR# 3823

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Anthony Thomas — Signature: Anthony Thomas — Month 10 Day 05 Year 07

16. International Shipments: ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: Eric Woltering — Signature: E. Wolt — 5147/3822 — Month 10 Day 05 Year 07

Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy

18a. Discrepancy Indication Space: ☒ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name — Signature — Month Day Year

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR

CERTIFICATE OF DISPOSAL

This certificate is to verify the wastes specified on Manifest # 00277435533K

have been properly disposed of in accordance with all local, state and federal regulations.

"Disposed of" means either: 1) Burial or 2) Processed as specified in 40 CFR et sea.

FACILITY NAME: *(Please check one)*

☑ Michigan Disposal Waste Treatment Plant (EPA I.D. # MID000724831)

☐ Wayne Disposal, Inc. (EPA I.D. # MID048090633)

ADDRESS: 49350 N. I-94 Service Drive
Belleville, Michigan 48111

PHONE NUMBER: 1-800-592-5489

FAX NUMBER: 1-800-593-5329

Authorized Signature: _____

THE ENVIRONMENTAL QUALITY COMPANY 49350 N. I-94 SERVICE DRIVE BELLEVILLE MICHIGAN 48111

FORM1020 (3/96)

3833

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number: ILD062444435	2. Page 1 of 1	3. Emergency Response Phone: 618-274-5000	4. Manifest Tracking Number: 002774354 JJK

5. Generator's Name and Mailing Address: BIG RIVER ZINC, 2401 MISSISSIPPI AVE, SAUGET, IL 62201

Generator's Site Address (if different than mailing address)

Generator's Phone: 618 274-5000

6. Transporter 1 Company Name: Feldman Truck Co. — U.S. EPA ID Number: ILR000135036

7. Transporter 2 Company Name — U.S. EPA ID Number

8. Designated Facility Name and Site Address: MICHIGAN DISPOSAL WASTE TREATMENT PLANT, 49350 NORTH I-94 SERVICE DRIVE, BELLEVILLE, MI 48111 — U.S. EPA ID Number: MID000724831

Facility's Phone: (800) 592-5489

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. HAZARDOUS WASTE, SOLID, N.O.S., (CADMIUM), 9, NA3077, PGIII, ERG#171, 6087610101	001	DT	52080	P	D006
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information

A: 6087610101 C:

B: D:

(FOR CONCRETE) TR# 3833

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.

I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Anthony Thomas — Signature: Anthony Thomas — Month 10 Day 05 Year 07

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:

Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: William Houser — Signature: [signature] — Month 10 Day 05 Year 07

Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name — Signature — Month Day Year

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete. DESIGNATED FACILITY TO GENERATOR

CERTIFICATE OF DISPOSAL

This certificate is to verify the wastes specified on Manifest # 002274354 SSR

have been properly disposed of in accordance with all local, state and federal regulations.

"Disposed of" means either: 1) Burial or 2) Processed as specified in 40 CFR et sea.

FACILITY NAME: *(Please check one)*

- [x] Michigan Disposal Waste Treatment Plant (EPA I.D. # MID000724831)
- [ ] Wayne Disposal, Inc (EPA I.D. # MID048090633)

ADDRESS: 49350 N. I-94 Service Drive
Belleville, Michigan 48111

PHONE NUMBER: 1-800-592-5489

FAX NUMBER: 1-800-593-5329

Authorized Signature: [signature]

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
ILD062444435	1	618-274-5000	002774357 JJK

5. Generator's Name and Mailing Address: BIG RIVER ZINC
2401 MISSISSIPPI AVE
SAUGET, IL 62201

Generator's Site Address (if different than mailing address): OHD

Generator's Phone: 618 274-5000

6. Transporter 1 Company Name: Wills Trucking — U.S. EPA ID Number: OHD068913409

7. Transporter 2 Company Name: — U.S. EPA ID Number:

8. Designated Facility Name and Site Address: MICHIGAN DISPOSAL WASTE TREATMENT PLANT
49350 NORTH I-94 SERVICE DRIVE
BELLEVILLE, MI 48111

Facility's Phone: (800) 592-5489 — U.S. EPA ID Number: MID000724831

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. HAZARDOUS WASTE, SOLID, N.O.S., (CADMIUM), 9, NA3077, PGIII, ERG#171, A0076118IMDI	001	DT	44620	P	D006
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
A: 0076101MDI C:
B: D:
(FOIS (NCRETE) TR# 419

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Anthony Thomas — Signature: Anthony Thomas — Month/Day/Year: 10 04 07

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: ______
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: L.C. Paulus — Signature: L.C. Paulus — Month/Day/Year: 10 04 07
Transporter 2 Printed/Typed Name: — Signature: — Month/Day/Year:

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) — U.S. EPA ID Number:
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name — Signature — Month Day Year

GENERATOR / INT'L / TRANSPORTER / DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete — DESIGNATED FACILITY TO GENERATOR

CERTIFICATE OF DISPOSAL

This certificate is to verify the wastes specified on Manifest # 00277435 7 JJK

have been properly disposed of in accordance with all local, state and federal regulations.

"Disposed of" means either: 1) Burial or 2) Processed as specified in 40 CFR et sea.

FACILITY NAME: *(Please check one)*

☑ Michigan Disposal Waste Treatment Plant (EPA I.D. # MID000724831)

☐ Wayne Disposal, Inc. (EPA I D. # MID048090633)

ADDRESS: 49350 N. I-94 Service Drive
Belleville, Michigan 48111

PHONE NUMBER: 1-800-592-5489

FAX NUMBER: 1-800-593-5329

Authorized Signature:

Please print or type (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: ILD062444435
2. Page 1 of: 1
3. Emergency Response Phone: 618-274-5000
4. Manifest Tracking Number: 002774338 JJK

5. Generator's Name and Mailing Address: BIG RIVER ZINC
2401 MISSISSIPPI AVE
SAUGET, IL 62201

Generator's Site Address (if different than mailing address)

Generator's Phone: 618 274-5000

6. Transporter 1 Company Name: Willis Trucking — U.S. EPA ID Number: OHD 068913459

7. Transporter 2 Company Name — U.S. EPA ID Number

8. Designated Facility Name and Site Address: MICHIGAN DISPOSAL WASTE TREATMENT PLANT
49350 NORTH I-94 SERVICE DRIVE
BELLEVILLE, MI 48111

Facility's Phone: (800) 592-5489 — U.S. EPA ID Number: MID000724831

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. HAZARDOUS WASTE, SOLID, N.O.S., (CADMIUM), 9, NA3077, PGIII, ERG#171, BG0761101NDI	001	DT	47040	P	D006		
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information

A: BG0761101NDI C:
B: D:

(FOR CONCRETE) TR # 366

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true

Generator's/Offeror's Printed/Typed Name: Anthony Thomas — Signature: Anthony Thomas — Month Day Year: 10 04 07

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Dean Dreher — Signature: [signature] — 10 04 07
Transporter 2 Printed/Typed Name — Signature

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1 | 2 | 3 | 4

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name — Signature — Month Day Year

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete. DESIGNATED FACILITY TO GENERATOR

CERTIFICATE OF DISPOSAL

This certificate is to verify the wastes specified on Manifest # 002774338JJK

have been properly disposed of in accordance with all local, state and federal regulations.

"Disposed of" means either: 1) Burial or 2) Processed as specified in 40 CFR et sea.

FACILITY NAME: *(Please check one)*

☑ Michigan Disposal Waste Treatment Plant
(EPA I.D. # MID000724831)

☐ Wayne Disposal, Inc.
(EPA I.D. # MID048090633)

ADDRESS: 49350 N. I-94 Service Drive
Belleville, Michigan 48111

PHONE NUMBER: 1-800-592-5489

FAX NUMBER: 1-800-593-5329

Authorized Signature:

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: ILD062444435
2. Page 1 of: 1
3. Emergency Response Phone: 618-274-5888
4. Manifest Tracking Number: 002774267 JJK

GENERATOR

5. Generator's Name and Mailing Address: BIG RIVER ZINC, 2401 MISSISSIPPI AVE, SAUGET, IL 62201
Generator's Site Address (if different than mailing address)
Generator's Phone: 618 274-5888

6. Transporter 1 Company Name: WILLS TRUCKING
U.S. EPA ID Number: OHD 068913409

7. Transporter 2 Company Name
U.S. EPA ID Number

8. Designated Facility Name and Site Address: MICHIGAN DISPOSAL WASTE TREATMENT PLANT, 49350 NORTH I-94 SERVICE DRIVE, BELLEVILLE, MI 48111
U.S. EPA ID Number
Facility's Phone: (888) 582-5469
MID980724831

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. HAZARDOUS WASTE SOLID, N.O.S., (GREENOIC, CHROMIUM), 9, NA3077, PGIII, ERG#171, 000760000001	001	DT	12900	P	D004	D006	
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information
A: 000760000001 C:
B: D: TR# 375

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Anthony Thomas
Signature: Anthony Thomas
Month: 09 Day: 25 Year: 07

INTL

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: SHAWN MOYER
Signature: [signature] Month: 09 Day: 25 Year: 07
Transporter 2 Printed/Typed Name
Signature Month Day Year

DESIGNATED FACILITY

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name Signature Month Day Year

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete

DESIGNATED FACILITY TO GENERATOR

CERTIFICATE OF DISPOSAL

This certificate is to verify the wastes specified on Manifest # 002774267 JJK

have been properly disposed of in accordance with all local, state and federal regulations.

"Disposed of" means either: 1) Burial or 2) Processed as specified in 40 CFR et sea.

FACILITY NAME: *(Please check one)*

☐ Michigan Disposal Waste Treatment Plant (EPA I.D. # MID000724831)

☐ Wayne Disposal, Inc. (EPA I.D. # MID048090638)

ADDRESS: 49350 N. I-94 Service Drive
Belleville, Michigan 48111

PHONE NUMBER: 1-800-592-5489

FAX NUMBER: 1-800-593-5329

Authorized Signature:

THE ENVIRONMENTAL QUALITY COMPANY 49350 N. I-94 SERVICE [redacted]

Please print or type. (Form designed for use on elite (12-pitch) typewriter)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: [illegible]
2. Page 1 of
3. Emergency Response Phone: [illegible]
4. Manifest Tracking Number: [illegible] JJK

5. Generator's Name and Mailing Address: [illegible]
2461 MISSISSIPPI DR
SAUGET, IL 62201
Generator's Site Address (if different than mailing address)
Generator's Phone: [illegible]

6. Transporter 1 Company Name: BEEMAN TRUCK CO
U.S. EPA ID Number: ILRQ00135236

7. Transporter 2 Company Name
U.S. EPA ID Number

8. Designated Facility Name and Site Address: MICHIGAN DISPOSAL WASTE TREATMENT PLANT
49350 NORTH I-94 SERVICE DRIVE
BELLEVILLE, MI 48111
U.S. EPA ID Number: MID000724831
Facility's Phone: (888) 592-5489

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. HAZARDOUS WASTE SOLID, N.O.S., (ARSENIC, CHROMIUM), 9, NA3077, PGIII, ERG#171, 000760000001	001	BT	12380	P	D004	D006	
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information
A: 000760000001 C: T/I #38625
B: D:

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Anthony Thomas
Signature: Anthony Thomas
Month: 09 Day: 24 Year: 07

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: Michael Capk
Signature: Michael Coyer
Month: 09 Day: 24 Year: 07

Transporter 2 Printed/Typed Name
Signature
Month Day Year

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H111			

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: Reynaldo Salcedo Sr.
Signature: Reynaldo Salcedo Sr.
Month: 09 Day: 24 Year: 07

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR

CERTIFICATE OF DISPOSAL

This certificate is to verify the wastes specified on Manifest # 002774255JK

have been properly disposed of in accordance with all local, state and federal regulations.

"Disposed of" means either: 1) Burial or 2) Processed as specified in 40 CFR et seq.

FACILITY NAME: *(Please check one)*

☑ Michigan Disposal Waste Treatment Plant (EPA I.D. # MID000724831)

☐ Wayne Disposal, Inc. (EPA I.D. # MID048090633)

ADDRESS: 49350 N. I-94 Service Drive
Belleville, Michigan 48111

PHONE NUMBER: 1-800-592-5489

FAX NUMBER: 1-800-593-5329

Authorized Signature:

[redacted]ONMENTAL QUALITY COMPANY 49350 N. I-94 SERVICE DRIVE BELLEVILLE MICHIGAN 48111

FORM1020 (3/96)

Steven 7/24/3820

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
IL D062444435	1	618-274-5888	002774266 JJK

GENERATOR

5. Generator's Name and Mailing Address: BIG RIVER ZINC, 2401 MISSISSIPPI AVE, SAUGET, IL 62201
Generator's Site Address (if different than mailing address)
Generator's Phone: 618 274-5888

6. Transporter 1 Company Name: Berman Truck Co. — U.S. EPA ID Number: ILR000135236

7. Transporter 2 Company Name — U.S. EPA ID Number

8. Designated Facility Name and Site Address: MICHIGAN DISPOSAL WASTE TREATMENT PLANT, 49350 NORTH I-94 SERVICE DRIVE, BELLEVILLE, MI 48111 — U.S. EPA ID Number: MID980724831
Facility's Phone: (888) 592-5469

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. HAZARDOUS WASTE SOLID, N.O.S., (CHROMIUM), 9, NA3077, PGIII, ERG#171, [illegible]	001	DT	12940	P	D004	D006	
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information
A: [illegible] C:
B: B: Tr# 3820

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Anthony Thomas — Signature: Anthony Thomas — Month: 09 Day: 24 Year: 07

INTL

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: Steven M Mysock — Signature: Steven M Mysock — Month: 09 Day: 24 Year: 07

Transporter 2 Printed/Typed Name — Signature — Month — Day — Year

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month — Day — Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name — Signature — Month — Day — Year

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR

CERTIFICATE OF DISPOSAL

This certificate is to verify the wastes specified on Manifest # 002774266 JJK

have been properly disposed of in accordance with all local, state and federal regulations.

"Disposed of" means either: 1) Burial or 2) Processed as specified in 40 CFR et seq.

FACILITY NAME: *(Please check one)*

☑ Michigan Disposal Waste Treatment Plant
(EPA I.D. # MID000724831)

☐ Wayne Disposal, Inc.
(EPA I.D. # MID048[illegible])

ADDRESS: 49350 N. I-94 Service Drive
Belleville, Michigan 48111

PHONE NUMBER: 1-800-592-5489

FAX NUMBER: 1-800-593-5329

Authorized Signature: _____

ATTACHMENT "B"

Certificate

This is to certify that

Anthony Thomas
Big River Zinc Corporation

has successfully completed

Hazardous Waste Management: The Complete Course

in accordance with 40 CFR 265.16

presented by

ENVIRONMENTAL RESOURCE CENTER

101 Center Pointe Drive, Cary, NC 27513 919-469-1585
www.ercweb.com

Lara Pilon, Instructor

June 12-13, 2007

Date

Certificate Number: 47226

Certificate

This is to certify that

Mike Altepeter
Big River Zinc Corporation

has successfully completed

Hazardous Waste Management:
The Complete Course

in accordance with 40 CFR 265.16

presented by

ENVIRONMENTAL RESOURCE CENTER
101 Center Pointe Drive, Cary, NC 27513 919-469-1585
www.ercweb.com

Lara Pilon, Instructor

June 12-13, 2007

Date
Certificate Number: 47225

Certificate of Achievement

This certificate has been awarded to:

Thomas Gallagher

at

Saint Louis, Missouri

Session#: 12815

For successfully completing the Lion Technology Inc. two-day Hazardous Materials Transportation Certification Workshop on regulations of the United States Department of Transportation, regarding the safe and legal transportation of materials designated as hazardous and for attaining a passing grade on the final proficiency test.

This training is designed to satisfy the General Awareness, Function-Specific, and Security Awareness training requirements of 49 CFR 172.704(a) for typical managers and supervisors of hazardous materials transportation functions. Training was conducted by Lion Technology Inc., Lafayette, NJ 07848 (973-383-0800).

This training completed on: ***16 November 2007***

National Registry of Professionals - Member PIN: 701-6666
1.3 CEUs, 1.0 CHMM CM Points, 2.0 ABIH CM Points, 13 NEHA CE Contact Hours Awarded

INSTRUCTOR

LION TECHNOLOGY INC.

Certificate of Achievement

This certificate has been awarded to:

Courtney Blind

at

St. Louis, Missouri

Seminar# 12813

For successfully completing the Lion Technology Inc. two-day Hazardous Materials Transportation Certification Workshop on regulations of the United States Department of Transportation, regarding the safe and legal transportation of materials designated as hazardous and for attaining a passing grade on the final proficiency test.

This training is designed to satisfy the General Awareness, Function-Specific, and Security Awareness training requirements of 49 CFR 172.704(a) for typical managers and supervisors of hazardous materials transportation functions. Training was conducted by Lion Technology Inc., Lafayette, NJ 07848 (973-383-0800).

This training completed on: ***16 November 2007***

National Registry of Professionals - Member PIN: 701-7854
1.3 CEUs, 1.0 CHMM CM Points, 2.0 ABIH CM Points, 13 NEHA CE Contact Hours Awarded

Marc Klemm

INSTRUCTOR

LION TECHNOLOGY INC.

Attachment "C"

Big River Zinc Corporation
2401 Mississippi Ave.
Sauget, IL 62201

Invoice Number: 2008-1 1/30/08

Vendor: **Staab Battery Mfg.**
931 S. 11th Street
Springfield, Il 62703

Remit To: Big River Zinc Corp.
2401 Mississippi Ave.
Sauget, Il 62201

Description	Qty. UOM	Unit Cost	Extended amount
Used Batteries	72 each	$4.00 ea	$288.00

Pick-up and delivery hours **7 a.m. till 3 p.m. Monday thru** Friday

Invoice Total due: $288.00

paid in cash
on pickup

Stop Number _____

CLAIM № 103610 DATE 1-3-08

BATTERY ADJUSTMENT FORM

Staab

Staab Battery Mgt. Co. Inc.
931 S. 11th St. Springfield, IL 62703

CUSTOMER Big T
ADDRESS _____
CITY/STATE _____
ACCOUNT # _____

Qty.	Part Number	Month Purchased	Claim Date	Stock Code	Reason For Failure	SBC Examination Report	Months Service	Amount Due

Paid in Cash
1-30-08

ACCT# _____ P/L _____
WHSE _____ DISC _____
SLSM _____ TERMS _____

_____ CREDIT MEMO
_____ DEBIT MEMO
STOCK ROTATION
_____ CONSIGNMENT RETURN

_____ JUNK UNITS
_____ PRICE PER UNIT
_____ TOTAL

AMOUNT _____
JUNK _____
TOTAL _____

TOTAL QUANTITY	H.M	DESCRIPTION	TOTAL WEIGHT
1		BATTERY WET FILLED WITH ACID, 8 (CORROSIVE MATERIAL) – UN2794, PGIII	

THIS IS TO CERTIFY THAT THE ABOVE NAMED MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED MARKED AND LABELED AND ARE IN PROPER CONDITION FOR TRANSPORTATION ACCORDING TO APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

CERTIFICATION SIGNATURE _____ RECEIVED BY _____

Z 0003

P.O. NO. ______________ 1/29. 8

RECEIVED FROM

BIG RIVER ZINC CORPORATION

2401 Mississippi Avenue
Sauget, IL 62201

BY THE your truck

TO BE DELIVERED TO Staab Batteries
7201 Pearson Lane
Hazelwood, Mo 63042

UNIT	DESCRIPTION	WEIGHT
72	used batteries	
	Staab will pay $1.00 per battery issued to Big River Zinc	
	[illegible]	
	[illegible]	

Lens Masters **RECYCLING BILL OF LADING** 5856

www.htr-group.com

HTR-GROUP
P.O. Box 185
Lake Ozark, MO 65049
Phone: 573-302-7575 Fax: 573-302-7579
Email: sales@htr-group.com

Bill of Lading No: [redacted]

Fed. I.D. #43-1741927 | Resource Recovery #RR0560
US EPA #MOR000504456 | MO Gen #038836
US DOT #690597 | US DOT HAZMAT#012203 709 002K
MO Haz Waste Trans. #H-2243 | TSCA #MOW000000179

GENERATOR OF WASTE

NAME Big River Zinc
ADDRESS 2401 W. Sunset Plaza Dr.
CITY, STATE, ZIP Sugar IL 62201
CONTACT Sue
PHONE # 618-274-6278
P.O. #

DESCRIPTION OF WASTE:

X UNIVERSAL WASTE
X HAZARDOUS WASTE
OTHER

The material as marked under "DESCRIPTION OF WASTE" was properly identified and prepared for transportation and tender in accordance with all applicable statues, ordinances, permits, rules and regulations of the Federal, State and local governments in whose jurisdiction such materials originates, passes through or is tendered for delivery. I certify (or declare) under penalty of perjury that the forgoing is true and correct. HTR-GROUP upon acceptance and recyle of the above described waste will have rendered a service and upon submission of an invoice charges will be due in accordance with contract or in lieu of contract, prevailing current rates in effect at time of service.

Signature of generator authorized agent | Title | Date

TYPE	UNIT OF MEASURE	QUANTITY	ORDER TRACKING SYSTEM
1 FOOT FLUORESCENT LAMP/S RECYCLING	each		
2 FOOT FLUORESCENT LAMP/S RECYCLING	each	4	
3 FOOT FLUORESCENT LAMP/S RECYCLING	each		
4 FOOT FLUORESCENT LAMP/S RECYCLING	each	229	
6 FOOT FLUORESCENT LAMP/S RECYCLING	each		
5 FOOT FLUORESCENT LAMP/S RECYCLING	each		
7 FOOT FLUORESCENT LAMP/S RECYCLING	each		
8 FOOT FLUORESCENT LAMP/S RECYCLING	each	35	
		0	
UTUBE FLUORESCENT LAMP/S RECYCLING	each		
CIRCULAR FLUORESCENT LAMP/S RECYCLING	each	9	
HID LAMP/S MERCURY/HALIDE/SODIUM LAMP RECYCLING	each	96	
SHATTER-SHIELD/POWER GROOVE LAMP/S RECYCLING	each		
INCANDESCENT LAMP/S RECYCLING	each		
MISC. LAMP/S RECYCLING	each		
BROKEN LAMP/S RECYCLING	lbs.		
CRUSHED FLUORESCENT LAMPS RECYCLING	lbs.		
PCB BALLAST RECYCLE/INCINERATION + Capacitors	lbs.	74	
NON-PCB BALLAST RECYCLE + Capacitors	lbs.	18	
15 Lead Acid Batteries	lbs	700	

Sue

HTR RECEIVING TECHNICIAN

The described waste was tendered to me for removal and transported to: ____ Treatment Facility; ____ Secondary Transporter
I certify (or declare) under penalty or perjury that the foregoing is true and correct.

Prime Transporter | Title | Date

W. Bradley | 9-26-07
Secondary Transporter Signature | Title | Date

TREATMENT FACILITY:

NAME: HTR-GROUP CITY: KAISER STATE: MO ZIP: 65047

The transporter above delivered the described waste to this facility and it was acceptable material under Federal, State and local regulations.

TREATMENT METHOD: RECYCLE DISPOSAL DATE: LAMPS WITHIN 12 DAYS OF DELIVERY

I certify (or declare) under penalty or perjury that the foregoing is true and correct

Signature of HTR Receiving Technician | *Title* | *Date*

White - Generator Canary - Office Pink - Accounting Blue - Customer Green - Tracking


PLASTIC CUPS

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

JAN 17 2008

LR-8J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Michael Altepeter
Environmental Manager
Big River Zinc Corporation
2401 Mississippi Avenue
Sauget, IL 62201

Re: Notice of Violation
Big River Zinc Corporation
EPA Id No.: ILD062444435

Dear Mr. Altepeter:

On September 19, 2007, a representative of the United States Environmental Protection Agency (U.S. EPA) inspected the Big River Zinc Corporation (BRZ) located in Sauget, Illinois. The purpose of the inspection was to evaluate BRZ's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. Please find enclosed a copy of the inspection report for your reference.

Based on information provided by BRZ personnel, review of records, and physical observations made by the inspector at the time of the investigation, U.S. EPA has determined that BRZ is engaged in storage of hazardous waste without a permit, and is in violation of certain requirements of the Illinois Administrative Code (IAC) and United States Code of Federal Regulations (CFR). To be eligible for the exemption from having a hazardous waste storage permit, BRZ must be in compliance with the conditions of 35 IAC § 722.134(a) and (c) [40 CFR § 262.34(a) and (c)]. We find that BRZ was in noncompliance with the following conditions for a hazardous waste storage permit exemption, and in violation of the following requirements:

1. In order to avoid the need for a hazardous waste storage permit, a large quantity generator of hazardous waste accumulating hazardous waste on-site, must store the waste in containers, tanks, drip pads or containment building. See, 35 IAC § 722.134(a)(1) [40 CFR § 262.34(a)(1)].

At the time of the inspection, BRZ was storing hazardous waste concrete and wood generated from its demolition activities in two open piles located on northeast portion of the plant. The hazardous waste concrete was being stored in a pile on the former concentrate storage pad, and the hazardous waste wood was being stored in a pile located just to the west of the former concentrate storage building. BRZ, therefore, failed to comply with the above-mentioned condition for a hazardous waste storage permit exemption.

2. In order to avoid the need for a hazardous waste storage permit, a large quantity generator must include the following information, among other things, in its hazardous waste contingency plan:

- The plan must describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to 35 IAC § 725.137.

- The plan must list names, **addresses**, and phone numbers (office and home) of all persons qualified to act as emergency coordinator, and this list must be kept up to date. Where more than one person is listed, one must be named as primary emergency coordinator and others must be listed in the order in which they will assume responsibility as alternates. [emphasis added]

- The plan must include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems [internal and external], and decontamination equipment) where this equipment is required. This list must be kept up to date. In addition, the plan must include the location and a physical description of each item on the list and a **brief outline of its capabilities**. [emphasis added]

See, 35 IAC §§ 722.134(a)(4) and 725.152 [40 CFR §§ 262.34(a)(4) and 265.52]. These are also requirements of owners and operators of hazardous waste storage facilities under 35 IAC §§ 724.152 and 725.152 [40 CFR §§ 264.52 and 265.52].

At the time of the U.S. EPA inspection, BRZ's hazardous waste contingency plan did not describe arrangements agreed to by the local police department, fire department, hospitals, contractors and State and local emergency response teams pursuant to 35 IAC § 725.137. The contingency plan also did not list the addresses of the persons designated as emergency coordinators. In addition, the contingency plan did not provide a brief outline of the capabilities of each piece of emergency equipment.

Therefore, BRZ failed to comply with the above-mentioned condition for a hazardous waste storage permit exemption, and violated the hazardous waste storage facility contingency plan requirements.

3. In order to avoid the need for a hazardous waste storage permit, a large quantity generator must maintain the following document with respect to its training program for employees with duties involving hazardous waste management:

   - A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position related to hazardous waste management.

   See, 35 IAC §§ 722.134(a)(4) and 725.116(d)(3) [40 CFR §§ 262.34(a)(4) and 265.16(d)(3)]. This is also a requirement of owners and operators of hazardous waste storage facilities under 35 IAC §§ 724.116(d)(3) and 725.116(d)(3) [40 CFR §§ 264.16(d)(3) and 265.16(d)(3)].

   At the time of the inspection, BRZ did not have the above-mentioned document. BRZ, therefore, failed to comply with the above-mentioned condition for a hazardous waste storage permit, and violated the hazardous waste storage facility training requirement.

4. A large quantity generator who accumulates hazardous waste on-site and who does not meet the conditions for a permit exemption of 35 IAC § 722.134(a) [40 CFR § 262.34(a)] is an operator of a hazardous waste storage facility, and is required to obtain an Illinois hazardous waste storage permit. See, 35 IAC §§ 703.121(a) and (b); 703.180(c); 705.121(a).

   Upon failing to comply with the conditions for a hazardous waste permit exemption specified in items 1 through 3, above, BRZ's failure to apply for and obtain a hazardous waste storage permit violated the permitting requirements of 35 IAC §§ 703.121(a) and (b); 703.180(c); and 705.121(a).

At this time, U.S. EPA is not requiring BRZ to apply for and obtain a hazardous waste storage permit so long as it immediately establishes compliance with the conditions for an exemption outlined above. According to Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), U.S. EPA may issue an order assessing a civil penalty for any past or current violation requiring compliance immediately or within a specified time period. Although this letter is not such an order, you are hereby requested to submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above conditions and requirements.

It should also be noted that at the time of U.S. EPA's inspection, BRZ was storing universal waste lamps and batteries in a small shed located next to a fueling station. Many of the lamps were not being stored in containers or packages, or were in containers or packages that were not large enough to completely contain the lamp (i.e., one end of the lamp was protruding from the container). Regarding the lamps that were in containers, the containers were not labeled with the words, "Universal Waste-Lamps," "Waste Lamps," or "Used Lamps." Finally, the waste batteries were not labeled with the words, "Universal Waste-Batteries," "Waste Batteries," or "Used Batteries."

Please be informed that the Standards for Small Quantity Handlers of Universal Waste in Illinois require a small quantity handler of universal waste lamps to contain all lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions. In addition, each container or package of universal waste lamps must be labeled or clearly marked with one of the following phrases: "Universal Waste-Lamps," "Waste Lamps," or "Used Lamps." Finally, universal waste batteries (i.e., each battery) or a container in which the batteries are contained must be labeled or marked clearly with any one of the following phrases: "Universal Waste-Batteries," "Waste Batteries," or "Used Batteries."

You should submit your response to Todd Brown, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604. If you have any questions regarding this letter, please contact Mr. Brown, of my staff, at (312) 886-6091.

Sincerely,

Willie H. Harris

Willie H. Harris, P.E.
Chief
RCRA Branch
Land and Chemicals Division

Enclosure

cc: Todd Marvel, Illinois Environmental Protection Agency

Land and Chemicals Division

Type of Document:
- ☐ Termination of Order
- ☒ Notice of Violation and Inspection Report/Checklist
- ☐ No Violation Letter and Inspection Report/Checklist
- ☐ Letter of Acknowledgment
- ☐ Information Request
- ☐ Pre-Filing Notice and Opportunity to Confer
- ☐ State Notification of Enforcement Action
- ☐ Other Correspondence

Facility Name: Big River Zinc Corporation

Facility Location: 2401 Mississippi Avenue

City: Sauget **State:** Illinois

U.S. EPA ID#: ILD062444435

Assigned Staff: Todd Brown **Phone:** (312)886-6091

Name	Signature	Date
Author	Todd Brown	1/2/08
CS1 Section Chief Initial Review	Laura M. Jurgens	1/3/08
Regional Counsel	[signature]	1/14/08 w/ comm's
CS1 Section Chief Final Review	[signature]	1/14/08
LCD Branch Chief	Willie Harris	1/15/08

Directions/Request for Clerical Support:

After the Section Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
   - One copy for the assigned staff;
   - One copy for the section file;
   - One copy for the branch file; and
   - One copy for the official file copy.
3. Make any additional copies for cc=s or bcc=s.
4. Mail the original certified mail and distribute office copies and cc=s and bcc=s.

Once the certified mail receipt is returned:

5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.